

FILED

Oct 21, 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT

for the

Eastern District of California

United States of America

v.

ALEX MOYANO, MAITE CELIS, ERIK OSORIO,
PABLO VALDEZ, ROSA BASTIAS, CAMILO
SEPULVEDA, JOHN DOES 2, BASSIL DACOSTA,
CAMILO ALARCON and MICHELLE PARADA

SEALED

Case No. 1:24-mj-00121-EPG

Defendant(s)

CRIMINAL COMPLAINT BY RELIABLE ELECTRONIC OR TELEPHONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2024 to October 19, 2024 in the county of Fresno and other counties in the
Eastern District of California, the defendant(s) violated:

Code Section

Offense Description

18 USC 371

Conspiracy to Commit Bank Robbery and Incidental Crimes
Maximum penalty: 5 years imprisonment, \$250,000 fine,
3 years supervised release, \$100 special assessment

18 USC 2113(a)

Bank Robbery and Incidental Crimes
Maximum penalty: 20 years imprisonment, \$250,000 fine,
3 years supervised release, \$100 special assessment

This criminal complaint is based on these facts:

See affidavit of SA Nathan Blevins.

☒ Continued on the attached sheet.



Complainant's signature

Nathan Blevins, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P.
4.1 by telephone

Date: **Oct 21, 2024**



Judge's signature

City and state: Fresno, California

Hon. Erica P. Grosjean, U.S. Magistrate Judge

Printed name and title

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) ALEX MOYANO MORALES
(2) MAITE CELIS SILVA
(3) ERIK OSORIO OLIVAREZ
(4) PABLO ANDRES VALDEZ RODRIGUEZ
(5) ROSA FRANCISCA BASTIAS SERRA
(6) CAMILO ANDRES SEPULVEDA GUZMAN
(7) JOHN DOE 2
(8) BASSIL ALEJANDRO DACOSTA FRIAS
(9) CAMILO ALARCON ALARCON
(10) MICHELLE ALONDRA PARADA MUNOZ
Defendants.

CASE NO.

AFFIDAVIT IN SUPPORT OF COMPLAINT

FILED UNDER SEAL

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I, Nathan Blevins, being first duly sworn under oath, depose and say:

I. INTRODUCTION AND AGENT BACKGROUND

A. Purpose of Affidavit

1. This warrant seeks the arrest of the target subjects for two violations:

- a) 18 U.S.C. § 371, Conspiracy to Commit Bank Robbery and Incidental Crimes, in that between May 1, 2024, and the present, the defendants agreed to commit violations of 18 U.S.C. § 2113(a), (b) and (c), and that one or more members of the conspiracy performed one or more

1 overt acts after May 1, 2024, in furtherance of that conspiracy, including entering into a building
2 used in whole or in part as a bank by Wells Fargo in Modesto, CA on September 18, 2024, a
3 bank, for the purpose of committing a larceny.

4 b) 18 U.S.C. § 2113(a), Bank Robbery, in that on September 18, 2024, the defendants
5 entered or attempted to enter any bank, credit union, or any savings and loan association, or any
6 building used in whole or in part as a bank, credit union, or as a savings and loan association,
7 with intent to commit in such bank, credit union, or in such savings and loan association, or
8 building, or part thereof, so used, any felony affecting such bank, credit union, or such savings
9 and loan association and in violation of any statute of the United States, or any larceny,
10 specifically a Wells Fargo in Modesto, CA, a bank, for the purpose of committing a larceny, or
11 aided and abet or conspired to commit the same.

12 2. The target subject are: **Alex MOYANO Morales (MOYANO), Maite CELIS Silva**
13 **(CELIS), Erik OSORIO Olivarez (OLIVAREZ), Pablo VALDEZ Rodriguez (VALDEZ), Rosa**
14 **Francisca BASTIAS Serra (BASTIAS), Camilo Andres SEPULVEDA Guzman (SEPULVEDA),**
15 **JOHN DOE 2, Bassil Alejandro DACOSTA Frias (DACOSTA), Camilo ALARCON Alarcon**
16 **(ALARCON), and Michelle Alondra PARADA Munoz (PARADA).**

17 **B. Agent Experience**

18 3. I am a “Federal law enforcement officer” within the meaning of Rule 41(a)(2)(C) of the
19 Federal Rules of Criminal Procedure, that is, a federal law enforcement agent engaged in enforcing
20 criminal laws and authorized to request a search warrant.

21 4. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been
22 employed with the FBI since January 2019. I have successfully completed the 20-week FBI Basic Field
23 Training Course in Quantico, Virginia. During my time at the FBI Academy, I received training in a
24 variety of investigative and legal matters, including the topics of Fourth Amendment searches, the
25 drafting of search warrant and complaint affidavits, and probable cause. Additionally, I received forty
26 hours of Cyber-Crime training, which included training on cellular devices. I have also attended
27 multiple trainings and conferences specific to investigating gangs and narcotics trafficking
28

1 organizations.

2 5. I possess a Bachelor of Science degree in Law Enforcement from Metropolitan State
3 University. Prior to my career with the FBI, I served in the United States Marine Corps as a Military
4 Police Officer and Accident Investigator. I was also the owner/operator of a private investigation firm
5 that specialized in surveillance and investigations of insurance fraud for 15 years. Throughout my
6 career, I have attended trainings and worked with various law enforcement agencies to investigate and
7 successfully close a variety of cases.
8

9 6. I am currently assigned to the Federal Bureau of Investigation (FBI) Sacramento Division
10 – Fresno Resident Agency, as a member of the Violent Crime Squad and the Safe Streets Task Force. In
11 that capacity, I investigate violations of the United States Code as defined in Title 18 and Title 21,
12 United States Code, and Title 28, of the Federal Code of Regulations. I have personally investigated
13 and/or assisted other agents and officers in their investigations involving violations of Title 18, United
14 States Code § 2113, bank robbery and incidental crimes.
15

16 7. I have also become familiar with the way bank robbery crews use telephones, often
17 cellular phones, to conduct their illegal operations. Specifically, I know that bank robbery crews use
18 cellular phones to facilitate their criminal activities. In my experience conducting bank robbery
19 investigations, I have found phones to be used for verbal conversations, text messaging, or other instant
20 messaging to conduct bank robbery activities. Through my training, experience, and interaction with
21 other experienced special agents, task force officers, and other bank robbery investigators, I have
22 become familiar with the methods deployed by bank robbery crews to plan and carryout bank robberies,
23 and to communicate with other participants of the crew to accomplish such objectives.
24

25 8. I have personally participated in the investigation set forth below. I am familiar with the
26 facts and circumstances of the investigation through my personal participation; from discussions with
27 other agents of the FBI and other law enforcement officers; and from my review of records, reports, and
28

1 surveillance videos relating to the investigation.

2 9. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the
3 information was provided by another agent, law enforcement officer or witness who may have had either
4 direct or hearsay knowledge of that statement and to whom I or others have spoken or whose reports I
5 have read and reviewed. Such statements are among many statements made by others and are stated in
6 substance and in part unless otherwise indicated. Because this Affidavit is being submitted for the
7 limited purpose of securing complaints for the named subjects, I have not included each and every fact
8 known to me concerning this investigation. I have set forth only the facts that I believe establish
9 probable cause that evidence of the violations further described above in paragraph 1 have been
10 committed.
11

12 II. SUMMARY OF PROBABLE CAUSE

13 10. Between May 2024 and the present, individuals entered buildings containing bank
14 automated teller machines (ATMs) up and down the Eastern District of California, as well as in other
15 districts, by breaking into the rooms behind the public-facing wall-mounted ATMs, disabling security
16 systems, and then using tools to break into the vault of the ATMs themselves to take currency, all in
17 violation of 18 U.S.C. § 371, Conspiracy to Commit Bank Robbery and Incidental Crimes in violation of
18 18 U.S.C. § 2113(a), (b) and (c).

19 11. In September 2024, agents reviewed surveillance footage from the areas of several of the
20 robberies and identified suspect cars used in the robberies. Law enforcement found and stopped one of
21 those cars—a Chevrolet Suburban—and though the driver was not one of the targets of this
22 investigation, agents learned the car was a stolen vehicle associated with an underground car rental
23 network and that the car had been rented to Alex **MOYANO** on September 18, 2024, when a Wells
24 Fargo ATM was robbed at 2401 E. Orangeburg Ave, Modesto, CA.

25 12. The Suburban had an apple air tag device inside and its tracking information showed that
26 when it was rented to **MOYANO**, it was present at an Airbnb rental in Turlock, CA during the time of
27 the Modesto ATM robbery. Investigators then learned that **CELIS** was the renter of the Airbnb and had
28

1 rented other Airbnbs around the same time that coincided with the timing and location of several other
2 ATM burglaries, or burglary attempts.

3 13. The investigative team reviewed video footage from two of the Airbnbs that **CELIS**
4 rented in late September 2024, including the Turlock Airbnb and an Airbnb in Mount Shasta, CA.
5 Agents observed individuals moving into and out of the Airbnbs with hardcase toolboxes, tool bags, and
6 backpacks (some of which matched equipment seen at several of the robberies). Agents also compared
7 and matched the footage of several individuals staying at the Airbnbs to video footage captured from
8 surveillance video obtained from several ATM burglary locations.

9 14. Based on that review, in addition to **MOYANO** and **CELIS**, investigators identified
10 **OSORIO** (CELIS's boyfriend), **VALDEZ**, **BASTIAS**, **SEPULVEDA**, and **JOHN DOE 2** all present
11 at one or both of the Airbnbs and present at locations of robberies near in time to the robbery. A white
12 Audi that was present at one of the **CELIS**-rented Airbnbs was also identified and a warrant was written
13 for location information for that car.

14 15. Shortly after the bank/ATM larcenies that this crew committed at the Tri Counties Bank
15 in Fall River Mills, CA (which was near the Airbnb in Mount Shasta) near the end of September 2024,
16 some of the vehicles known to be connected to this South American Theft Group, or SATG (through
17 review of surveillance videos obtained from various larcenies and associated ATM rentals) were
18 captured on LPRs throughout Oregon. The investigative team learned that there were at least two
19 additional bank/ATM larcenies committed in Oregon during that same timeframe that matched the
20 modus operandi of numerous prior larcenies committed by this SATG.

21 16. In mid-October 2024, the location information from that white Audi led the investigative
22 team to an Airbnb in Oregon. That Airbnb was rented from October 16, 2024, to October 22, 2024.
23 Three cars tied to this group through surveillance footage were present at the Airbnb, including the
24 white Audi and a silver Ford Fiesta. In addition, **VALDEZ**, **BASTIAS**, **SEPULVEDA**, **DACOSTA**,
25 and **ALARCON** were all identified as occupants of the Oregon Airbnb.

26 17. On October 18, 2024, investigators obtained a warrant to search the Oregon Airbnb, but
27 the targets became suspicious of law enforcement presence and fled in haste from the rental property.
28 On the morning of October 19, 2024, investigators searched the Oregon Airbnb, and although no

1 persons or cars were present, investigators found a mass of robbery tools and hard tool cases, including
2 many that matched those seen in surveillance photographs from prior robberies and that had been seen in
3 the surveillance footage from the prior Airbnbs.

4 18. On the same date as the search of the Oregon Airbnb, the white Audi's location data led
5 the investigators to an Airbnb in Seattle, WA. As investigators prepared a warrant to search that
6 property, **BASTIAS** and **SEPULVEDA** exited the property, entered the white Audi, and were stopped
7 and arrested. Shortly thereafter, **VALDEZ**, **DACOSTA**, **ALARCON**, and a fourth Hispanic male
8 attempted to drive away from the Seattle Airbnb in the silver Ford Fiesta, but investigators detained
9 them. Investigators then froze the Seattle Airbnb and ordered out all occupants. **PARADA** and a second
10 Hispanic female exited and were detained. That same evening, the investigative team obtained a search
11 warrant for the Seattle Airbnb. Inside they found large sums of cash as well as backpacks and clothing
12 that matched what members of the SATG wore during prior larcenies. **VALDEZ**, **DACOSTA**,
13 **ALARCON**, and **PARADA** were arrested (in addition to **BASTIAS** and **SEPULVEDA**).

14 III. DEFENDANTS

15 19. **Alex MOYANO Morales**, aka "**Gordito**", aka "**Nicholas Hernandez**", aka "**Valentino**
16 **Ignacio Rodriguez Diaz (MOYANO)**" is believed to be a Chilean national who is known to possess a
17 Columbian driver's license under the name Valentino Ignacio Rodriguez Diaz and a U.S. driver's
18 license under the name Nicholas Hernandez. According to an October 26, 2021, U.S. Customs and
19 Border Protection (CBP) report, **MOYANO** is possibly affiliated with a South American Theft Group
20 (SATG). A confidential human source (CHS) identified **MOYANO** as the possible leader of a SATG
21 that has been identified as being responsible for numerous bank and ATM burglaries within the Eastern
22 District of California, as well as throughout California and possibly other western states. A review of the
23 criminal history records for **MOYANO** (under his alias of Nicholas Hernandez) revealed a March 13,
24 2024, arrest for theft out of Glendale, California. There is a current warrant out for the arrest of Nicholas
25 Hernandez (**MOYANO**) associated with the above-referenced arrest. As discussed more fully below,
26 based on the review of location information for various cell phone numbers associated with **MOYANO**,
27 cell phone communications between **MOYANO** and a member of an auto theft ring who rented
28 **MOYANO** a vehicle used in the commission of multiple ATM burglaries, and the surveillance video

1 from multiple Airbnbs rented by this SATG during the commission of multiple ATM burglaries, I
 2 believe **MOYANO** planned, conspired, and participated in numerous bank and ATM burglaries
 3 committed by this SATG.

4 20. **Maite CELIS Silva (CELIS)** is believed to be a Chilean national who, according to a
 5 September 8, 2023, CBP report, is a confirmed associate and member of a SATG and pending a F1 visa
 6 revocation. No criminal record was located associated with **CELIS**' true name. As discussed more fully
 7 below, based on the review of Airbnb records associated with **CELIS** and the review of surveillance
 8 videos from multiple Airbnbs rented by **CELIS** and used by this SATG, I believe **CELIS** planned,
 9 conspired, and possibly participated in numerous bank and ATM burglaries committed by this SATG.

10 21. **Erik OSORIO Olivarez (OSORIO)** is believed to be a Chilean national, the boyfriend
 11 of **CELIS**, and father of **CELIS**' expected child. According to a March 7, 2022, CBP report, **OSORIO**
 12 is affiliated with a SATG and was arrested in Sanford, Florida, on March 4, 2022. According to a
 13 October 3, 2022, CBP report, **OSORIO** was the subject of a document fraud investigation after being
 14 caught by Sanford PD in possession of a fraudulently manufactured Venezuelan Passport in the name of
 15 Carlos Alberto Casares Polanco. A review of **OSORIO**'s criminal history revealed a 2022 arrest for
 16 Grand Theft and False Identification, a 2022 arrest for Burglary of an Unoccupied Structure, and a 2023
 17 arrest for Use/Possess the ID of Another Person Without Consent. As discussed more fully below, based
 18 on the review and comparison of surveillance videos from multiple Airbnbs rented by **CELIS** (and
 19 where **OSORIO** and other members of this SATG were present) and the surveillance videos associated
 20 with multiple bank and ATM burglaries committed by this SATG, I believe **OSORIO** was involved in
 21 both scouting and participating in multiple bank and ATM burglaries.

22 22. **Pablo VALDEZ Rodriguez (VALDEZ)**, aka "**Pablo Andres Valdes Rodrigue**", aka:
 23 "**Andres Aldo Vega Ordonez**" is believed to be a Chilean national who is known to possess an
 24 Argentinian ID and driver's license under the name Andres Aldo Vega Ordonez. A review of
 25 **VALDEZ**'s criminal record showed that he was arrested by the FBI – LEGAT in Santiago Chile in
 26 2012. **VALDEZ** was also arrested on April 24, 2024, in Glendale, CA for Grand Theft. As discussed
 27 more fully below, based on the review and comparison of surveillance videos from multiple Airbnbs
 28 rented by **CELIS** (and where **VALDEZ** and other members of this SATG were present) and the

1 surveillance videos associated with multiple bank and ATM burglaries committed by this SATG, I
2 believe **VALDEZ** was involved in both scouting and participating in multiple bank and ATM
3 burglaries.

4 23. **Rosa Francisca BASTIAS Serra (BASTIAS)** is believed to be a Chilean national
5 involved in this SATG. According to a Red Notice, Interpol is asking law enforcement to locate and
6 arrest **BASTIAS** for possible extradition to Chile for **BASTIAS'** involvement in a 2015 theft resulting
7 in death, manslaughter, or murder. As discussed more fully below, based on the review and comparison
8 of surveillance videos from multiple Airbnbs rented by **CELIS** (and where **BASTIAS** and other
9 members of this SATG were present) and the surveillance videos associated with multiple bank and
10 ATM burglaries committed by this SATG, I believe **BASTIAS** was involved in scouting / participating
11 in multiple bank and ATM burglaries.

12 24. **Camilo Andres SEPULVEDA Guzman (SEPULVEDA)**, aka: "**Pablo Andres Ortiz**
13 **Colibe**", self-identified as a Peruvian national who has resided in Chile and is believed to be involved in
14 this SATG. **SEPULVEDA** was found to be associated with FBI number 636389PD8 and a 2011 arrest
15 by FBI LEGAT – Santiago, Chile. As discussed more fully below, based on the review and comparison
16 of surveillance videos from multiple Airbnbs rented by **CELIS** (and where **SEPULVEDA** and other
17 members of this SATG were present) and the surveillance videos associated with multiple bank and
18 ATM burglaries committed by this SATG, I believe **SEPULVEDA** was involved in both scouting and
19 participating in multiple bank and ATM burglaries.

20 25. **JOHN DOE 2** is believed to be a Chilean national involved in this SATG. As discussed
21 more fully below, based on the review and comparison of surveillance videos from multiple Airbnbs
22 rented by **CELIS** (and where **JOHN DOE 2** and other members of this SATG were present) and the
23 surveillance videos associated with multiple bank and ATM burglaries committed by this SATG, I
24 believe **JOHN DOE 2** was involved in both scouting and participating in multiple bank and ATM
25 burglaries.

26 26. **Bassil Alejandro DACOSTA Frias (DACOSTA)**, aka: "**Armando Garcia Montoya**",
27 aka: "**Francisco Antonio Marin Jitebaca**" is a Venezuelan national who has resided in Chile and is
28 believed to be involved in this SATG. **DACOSTA** was found to be associated with FBI number

RV1049PA7 and a 2022 “alien inadmissibility” encounter with CBP. As discussed more fully below, based on the review and comparison of surveillance video from the Mount Shasta Airbnb rented by **CELIS** (and where **DACOSTA** and other members of this SATG were present) and the surveillance videos associated with the bank and ATM burglary of the Tri Counties Bank in Fall River Mills, CA, I believe **DACOSTA** was involved in participating in multiple bank and ATM burglaries.

27. **Camilo ALARCON Alarcon (ALARCON)**, aka: “**Camilo Alarcon**”, is a Chilean national who is believed to be involved in this SATG. As discussed more fully below, based on the review and comparison of surveillance video from the Mount Shasta Airbnb rented by **CELIS** (and where **ALARCON** appeared to be present with other members of this SATG) and the surveillance videos associated with the bank and ATM burglary of the Tri Counties Bank in Fall River Mills, CA; surveillance of an Airbnb in Welches, OR, where **ALARCON** was present with multiple members of this SATG; a subsequent search warrant of that same Airbnb revealed the presence of a vast amount of burglary tools, construction outfits, facemasks, goggles, clothing, and signal jammers matching those known to be used by this SATG; and his association at a Seattle Airbnb with other individuals involved in the SATG crew, I believe **ALARCON** was involved in participating in multiple bank and ATM burglaries.

28. **Michelle Alondra PARADA Munoz (PARADA)**, is believed to be a Chilean national involved in this SATG. As discussed more fully below, based on her attempts to delay and then fight with agents at the Seattle Airbnb, the fact that other co-conspirators tried to mislead agents as to her presence at the Seattle Airbnb, the fact that she was delaying agents in order to place a call to an unknown individual, and the fact that a receipt was located showing her mailing a box from Oregon to California on the same date this SATG checked into the Oregon Airbnb where all of the burglary tools were subsequently located, I believe **PARADA** was involved in multiple bank and ATM burglaries.

IV. PROBABLE CAUSE

A. Background of Investigation

29. The banking institutions referred to within this complaint fall within 18 U.S.C. § 2113 because they are insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit

1 Union Administration (NCUA).

2 30. The FBI began investigating a bank larceny crew around May 2024 that has been
3 operating throughout California from around May 2024 to present. The Fresno FBI was first made
4 aware of this criminal group shortly after a bank larceny attempt was made in Merced, California on
5 June 12, 2024, at a Golden1 Credit Union ATM. The attempted larceny was made by an unknown group
6 of individuals disguised in covid-style masks and construction vests. Investigators then learned that there
7 had been several similar style bank larcenies in the Sacramento area, and based on review of the
8 recovered surveillance videos, the group's tactics matched: forced entry, their style of
9 clothing/disguises, and the equipment used during the larcenies (such as signal jammers and
10 blowtorches).

11 31. Investigators next learned that there had been a successful bank ATM larceny in Fresno
12 on May 5, 2024, that resulted in a cash loss exceeding \$80,000. After reviewing the case files and still
13 shot images from the May 5 Fresno larceny, the tactics matched the above robberies. It turned out, those
14 tactics also matched a robbery in Houston, Texas on January 27, 2024.

15 32. Following the discovery of these past bank larcenies, the investigative team retrieved
16 footage and case summaries from all the successful and attempted ATM bank larcenies that the
17 investigative team believed were connected based on recovered video footage and the crew's tactics.
18 Below are case summaries from a portion of the bank larcenies/attempts.

19 a) On January 27, 2024, at 2038 hours an unknown number of suspects entered
20 Wells Fargo located at 9715 Westheimer Rd. in Houston, Texas. The suspects were captured
21 partially on video camera footage from the bank and were wearing construction-style vests. The
22 security cameras were spray painted black and cell phone jammers were observed on the footage.
23 The subjects used blowtorches to break into the ATM; however, Wells Fargo has yet to produce
24 a known loss amount. This burglary attempt is similar in style and fashion to the others below
25 connected to California.

26 b) On May 5, 2024, an unknown number of suspects entered the Wells Fargo located
27 at 4472 W. Shaw Ave, STE 101 in Fresno, CA and stole approximately \$81,860 from the ATM.
28 The suspects wore construction outfits, spray painted cameras, and used blowtorches to access

1 the ATM's.

2 c) On June 1, 2024, an unknown number of suspects entered the Golden 1 Credit
3 Union located at 2248 Grass Valley Highway in Auburn, CA and stole approximately \$226,000
4 from the ATM. Similar tactics were used from cutting holes in walls and driving vehicles with
5 paper plates on them.

6 d) On June 11, 2024, three suspects entered the Golden 1 Credit Union located at
7 1124 W. Olive Avenue in Merced, CA in an unsuccessful attempt to burglarize the ATM. Based
8 on a review of this case file, these suspects used nearly identical tactics as the other similar ATM
9 larcenies in the Central Valley.

10 e) On June 21, 2024, at approximately 2010 hours, a call for service was received by
11 the Clovis Police dispatch regarding suspicious persons at the location of 3180 Fowler Avenue,
12 EECU ATM kiosk wearing construction clothing and other subjects wearing construction
13 clothing with a tarp covering the door of the ATM Kiosk. After conducting an investigation with
14 Clovis PD, it was determined there was approximately \$150-200K in each of the two ATMs that
15 was burglarized.

16 f) On July 10, 2024, at approximately 2311 hours, four Hispanic appearing males
17 attempted to burglarize an EECU ATM located at 6745 N. Milburn Ave., Fresno, CA. They were
18 wearing construction vests and masks and left behind crowbars and blowtorches after being
19 contacted by security. The individuals had spray painted a camera and made their way into the
20 ATM room.

21 33. Following the above incidents, there were numerous similar style ATM bank larcenies
22 throughout the Los Angeles and San Diego areas. There were no other larcenies of this type in the
23 Fresno area until September 2024.

24 **B. September 2024 bank/ATM larceny incidents and identification of several vehicles**
25 **including a Chevrolet Suburban.**

26 34. Throughout all the below ATM larcenies in September 2024 in Fresno, Modesto,
27 Roseville, Rocklin, Yuba City, and Fall River Mills three cars of interest were identified as used in one
28 or more of the larcenies or located via license plate readers as having been in the city during the

1 associated date and times of the larcenies. Those vehicles were:

- 2 a) a silver Chevrolet Suburban, bearing CA license plate: 9HCH781,
- 3 b) a silver Audi SUV, bearing CA license plate: 6XMP034, and
- 4 c) a white Ford Explorer, bearing CA license plate: 9JQJ805.

5 35. Here are the robberies that occurred in September 2024:

6 a) September 15, 2024 – Attempted larceny at Valley First Credit Union located at 7685
7 North Fresno Street, Fresno, CA

- 8 • At approximately 1935 hours, multiple suspects broke into the Valley First Credit Union
9 located at 7685 North Fresno Street, Fresno, CA. The suspects utilized power saws to attempt
10 to gain access into the ATMs but were unsuccessful. The suspects arrived in a white Ford
11 Explorer. The day before (September 14, 2024), the suspects arrived in a Chevrolet
12 Suburban (CA: 9HCH781)¹ and Audi G5² (CA:6XMP034) and could be seen casing the
13 location. Four males—including one wearing an upside-down LA baseball hat—were
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26 ¹ The Chevrolet Suburban was originally believed to be bearing California License Plate:
27 8VZN899 but was later confirmed to bear California License Plate: 9HCH781. This was done through
28 extensive license plate reader analysis and comparison of the suspect vehicle.

² The Audi plates were confirmed by FBI and local law enforcement agencies after numerous
similar larcenies following the latest Fresno incidents.

observed scouting the bank, their photos are below:



b) September 15, 2024 – ATM bank larceny at the EECU ATM located at 5241 N. Maple Ave Fresno, CA

- Following the above unsuccessful larceny attempt, there was a successful ATM bank larceny at the EECU ATM located at 5241 N. Maple Ave Fresno, CA, on the Fresno State University grounds. EECU conducted a review of surveillance footage and discovered that at least four unidentified suspects approached the ATM wearing masks and construction style hard hats around 10:37 PM hours. From around 10:37 PM until 10:47 PM, several of the subjects appeared to be inside the ATM kiosk and one stood in front of the ATM door as a “lookout.” The door to the ATM appeared to be pried open and the ATM had been cut open with a blowtorch. There were several yellow pry bar marks found on the ATM door. Within the room, a mini sledgehammer appeared to have been left behind by the subjects and was collected by Fresno State University Police. EECU estimated at least \$20,000 had been taken and at least \$17,000 was discovered left behind in one of the ATM cartridges. Based on a review of surveillance cameras in the area, the investigative team determined that a white

1 Ford Explorer was the likely get-away vehicle, similar to the one used earlier in the night at
2 Valley First Credit Union.

3 c) September 18, 2024, Wells Fargo ATM larceny at 2401 E. Orangeburg Ave, Modesto,
4 CA

- 5 • On September 18, 2024, the Wells Fargo ATMs were burglarized in similar fashion as the
6 above-described larcenies. \$247,000 in cash was reported to have been stolen. The subjects
7 responsible for this larceny had broken into an adjacent “pet spa” business, cut through the
8 wall and accessed the bank ATM room. The ATM was then cut open, likely by a blowtorch
9 and the cash was taken. Surveillance footage captured the suspects before and after the
10 robbery in the area as well as in the adjacent pet spa—including (1) a man with an upside-
11 down LA hat (**SEPULVEDA**), (2) a man with a white hat and blue button-down shirt
12 (**OSORIO**), (3) a female with a t-shirt and mask on (**BASTIAS**), (4) a man with a Titleist hat
13 (**VALDEZ**), (5) a man with a hardhat and all black shoes (**SEPULVEDA**), and (6) another
14 man with a hardhat and black shoes with white trim (**JOHN DOE 2**). A grey Audi occupied
15 by **SEPULVEDA**, **VALDEZ**, **OSORIO**, and **BASTIAS** was observed during the earlier
16 scouting of the pet spa and adjacent ATMs, and a white Ford Explorer occupied by numerous
17 males dressed in construction clothing was also identified in the area of the pet spa and
18 ATMs around the time of the larceny.

FIGURE 1 & 2: TWO MEMBERS OF THE SATG DISTRACTING THE PET SPA EMPLOYEES WHILE A THIRD LOOKS FOR INTERIOR CAMERAS AND TESTS THE MATERIAL OF THE WALL ADJacent TO THE ATMS



FIGURE 3 – 6: TWO MEMBERS OF THE SATG SCOUTING FOR SURVEILLANCE CAMERAS AND SPRAY PAINTING AN EXTERIOR CAMERA WHILE THE OTHERS DISTRACTED THE PET SPA EMPLOYEES



FIGURE 11 & 12: INSIDE THE PET SPA AFTER HOURS



d) September 22, 2024 – robbery of Golden 1 Credit Union ATM, located at 4011 Woodcreek Oaks Blvd. Suite 120, Roseville, CA,

- ATMS were burglarized around 1736 hours. (See figures 13 and 14 below).

e) September 22, 2024 – robbery of Golden 1 Credit Union ATM, located at 6839 Fivestar Blvd., Suite D, Rocklin, CA

- ATM was burglarized in similar fashion. More than \$50,000 had been discovered to have been stolen after subjects entered the ATM room through an adjacent unit. Lastly, later that night around 2129 hours, a Golden 1 Credit Union ATM, located at 1282 Stabler Lane, Suite 640, Yuba City, CA, was attempted to be burglarized via a similar fashion.

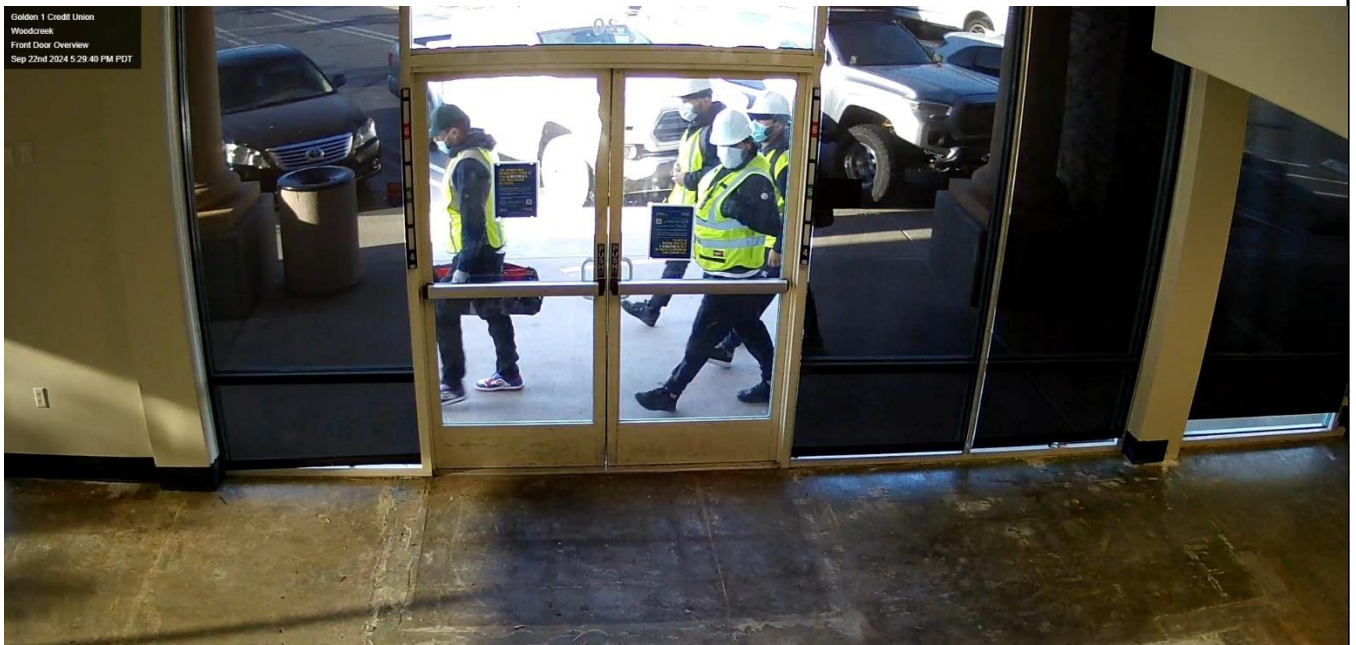


FIGURE 13 & 14: MEMBERS OF THE SATG OUTSIDE THE GOLDEN 1 ATMS IN ROSEVILLE
AFFIDAVIT IN SUPPORT OF COMPLAINT

f) September 27, 2024 – Robbery of Tri Counties Bank, located at 43308 299 Hwy E, Fall River Mills, CA,

- Bank was robbed at approximately 2145 hours. Just as described above, the subjects were dressed in construction vests and hard hats; wore covid-style facemasks; used black spray paint to cover the surveillance cameras; and utilized blowtorches, saws, and other power tools to access the bank and the interior safes/vaults. Below are still images obtained from the bank's surveillance videos:

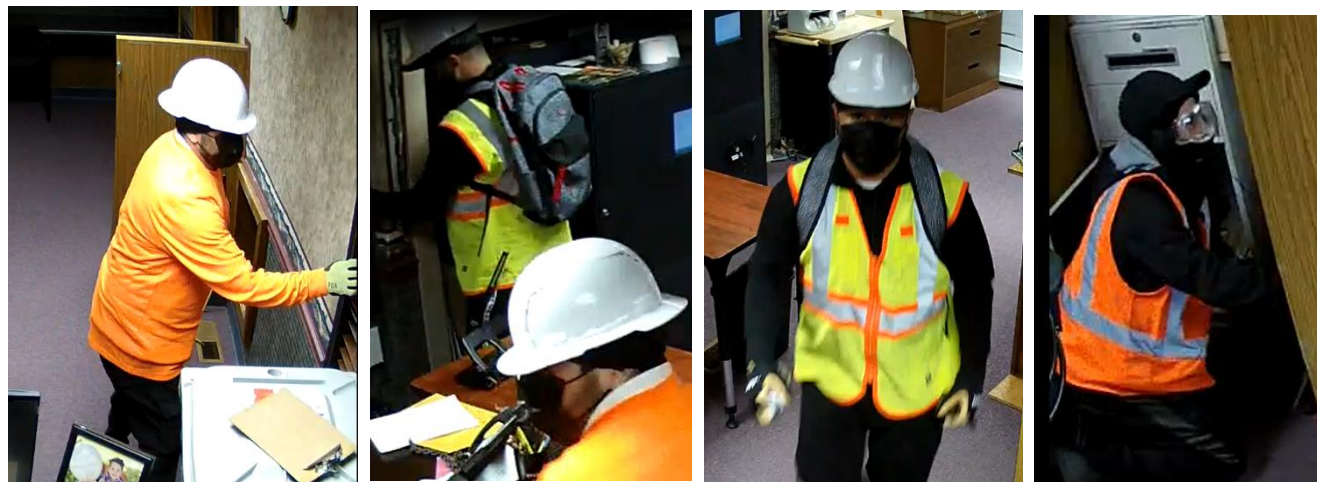


FIGURE 15 - 18: SATG MEMBERS INSIDE THE TRI COUNTIES BANK

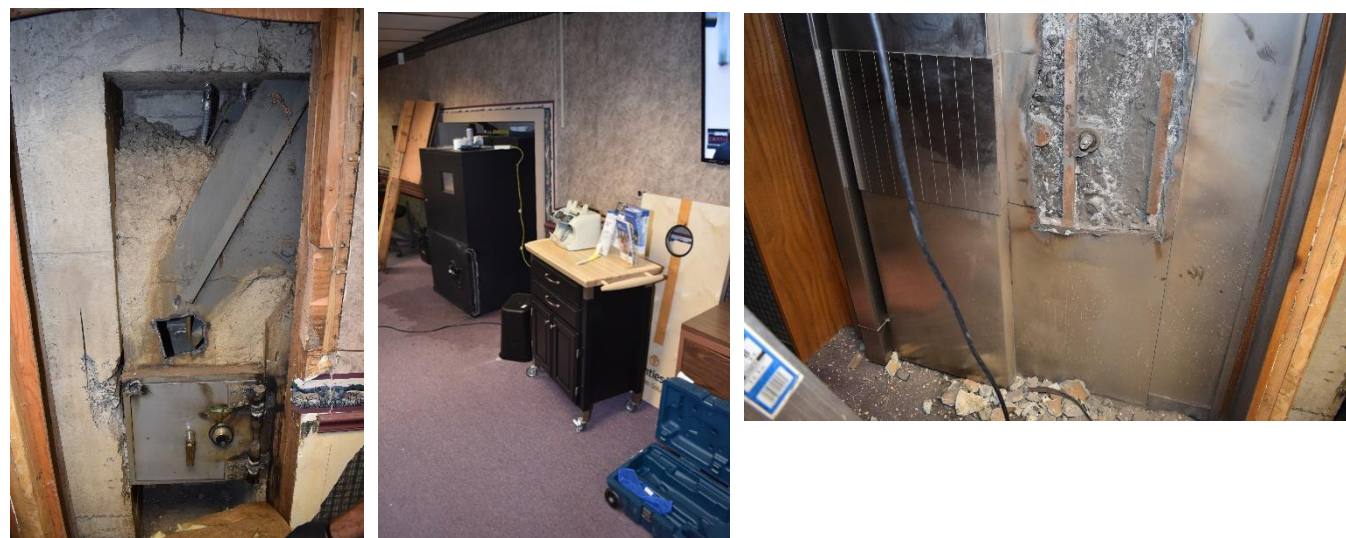


FIGURE 19 – 21: TORCHED OPEN OVERNIGHT DROPBOX SAFE, ATM VAULT, AND BLOWTORCH DAMAGE TO DOOR OF BANK VAULT

1
2 36. After this series of robberies, be on the lookouts (BOLO's) were placed on all three
3 vehicles—the silver Chevrolet Suburban, bearing CA license plate: 9HCH781, the silver Audi SUV,
4 bearing CA license plate: 6XMP034, and the white Ford Explorer, bearing CA license plate: 9JQJ805.

5 **C. September 26, 2024, traffic stop on silver Chevrolet Suburban, bearing CA license**
6 **plate: 9HCH781 leads to identification of MOYANO.**

7 37. On September 26, 2024, Simi Valley PD contacted the investigative team regarding a
8 BOLO alert for CA plate 9HCH781 equipped on the silver Chevrolet Suburban. As described above,
9 that Suburban had earlier appeared to be scouting numerous ATM locations prior to ATM thefts, as well
10 as dropping off SATG members at the time of the larcenies. Around 1100 hours on September 26, 2024,
11 that Suburban was traffic stopped by Simi Valley PD. During the traffic stop, the driver was identified
12 as J.H. Patrol officers ran the VIN number on the car and discovered the vehicle had been reported
13 stolen by Hertz rental car company. J.H. was the lone driver of the vehicle and had numerous USPS
14 packages in the car.



15 38. Members of the investigative team responded to the scene and interviewed J.H. J.H. was
16 given Miranda warnings and agreed to talk to law enforcement. J.H. stated that he had rented the car
17 from a club promoter known as "xtrackz." J.H. knew xtrackz through friends and the club life. J.H.
18 identified xtrackz Instagram account as "xtrackz_". J.H. also was given xtrackz number by his friend
19 "Moises." Xtrackz phone number was 310-735-3714. J.H. stated he paid \$700 for the car rental, in
20 addition to a \$500 deposit. He sent money via Zelle to phone number 818-619-4953. J.H. reiterated
21 several times that xtrackz rented him the car and his friend Moises had picked up the car on J.H.'s
22 behalf.

23 39. Members of the investigative team reviewed xtrackz Instagram and one of his latest
24 Instagram stories read, "tap in for car rentals and Airbnb." Xtrackz appeared to be a club promoter in
25 LA. After conducting a review of xtrackz phone number and conducting open-source searches, FBI
26 analysts were able to identify that subject C.L. was xtrackz' true name. On September 26, 2024, a
27 member of the investigative team wrote a state search warrant for C.L.'s person and devices. FBI agents
28 contacted C.L. later that night at a nightclub in West Hollywood, CA. C.L.'s phone was seized and

1 searched by the investigative team. Additionally, C.L. was interviewed by agents and confirmed he had
2 rented out a Suburban recently to numerous individuals. C.L. claimed he was unaware the Suburban was
3 stolen; however, he did have information for who had rented the Suburban during the month of
4 September. C.L. located numerous text and Instagram messages between himself and “Gordito.” Gordito
5 was a Chilean male he had met through the club. Gordito’s Instagram username was, “66newyorkkk”.
6 The investigative team reviewed the text and Instagram messages between C.L. and Gordito and
7 identified Gordito as Alex **MOYANO** based on selfie-style photographs of **MOYANO** on the
8 “66newyorkkk” account. I have reviewed immigration photos of Alex **MOYANO** as part of this
9 investigation and have become familiar with his appearance. I am familiar with **MOYANO**’s
10 appearance based on prior investigation in this case. Cell phone number 516-614-2389—which was
11 previously associated with **MOYANO** through money wire records—was found to be in the immediate
12 location of at least seven of the bank/ATM larcenies or attempted larcenies associated with this SATG
13 after obtaining court-ordered “tower dumps” from the immediate area of prior larcenies.

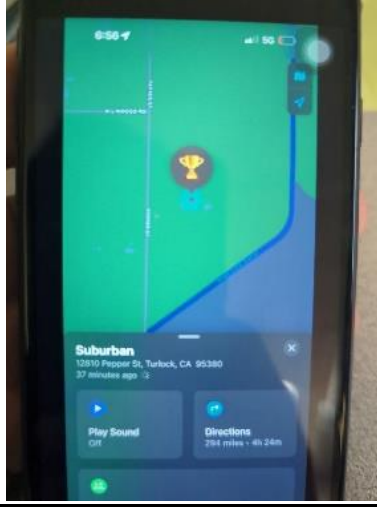
14 40. The investigative team conducted a more thorough review of C.L.’s phone and
15 discovered numerous text messages between himself and his work associate, “Moises” (identified as
16 “Moises” B., last name known but hidden for identity purposes). One conversation between the two
17 uncovered that there were Apple Air Tags placed in all the rental vehicles that Moises B., C.L., and their
18 additional work associates would rent out. An Apple Air Tag had also been discovered earlier in the day
19 located in the Suburban stopped by Simi Valley PD.

20 41. Between September 12, 2024, and September 22, 2024, Moises B., using telephone
21 numbers 213-662-7733 and 323-345-8079 communicated with C.L., using telephone number 925-705-
22 6572, regarding the stolen grey 2022 Chevrolet Suburban that they rented to **MOYANO**. C.L. also
23 communicated with **MOYANO** via **MOYANO**’s Instagram account of 66newyorkkk regarding the
24 same Suburban. These communications have been transcribed and translated where needed below,
25 Xtrackz = C.L.:

SENDER / RECEIVER	DATE / TIME	MESSAGE	TRANSLATION
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24 @ 9:50 AM		
		Cuanto por semana?	How much per week?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24 @ 12:55 PM	800 Pero para vos 500	800 But for you 500
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	La tienes para hoy?	Do you have it for today?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Si. Si la Quieres comprar tambien	Yes. If you want to buy it also?
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	La quiero rentar bro. En cuanto la vendas	I want to rent it bro. How much are you selling it?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Dale. Unos 8	Go ahead. About 8
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Porque tan barata? Que ano es? Yo la compro pero necesito rentarla primero una semana. Voy de vacaciones. Llego mi familia. Y mi carro es muy chico.	Why is it so cheap? What year is it? I'll buy it but I need to rent it first for a week. I'm going on vacation. I'm taking my

			family. And my car is very small.
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Cual es tu numero Perdi todo Mis contacts	What is your number? I lost all of my contacts.
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	747-256-0982. Llamame hermano. La nesesito urgente	747-256-0982. Call me. I need it in a hurry.
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Cuanto por la Suburban	How much for the Suburban?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Una semana?	A week?
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Sii. Todo es por una semana	Yes. The total for a week.
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	La suburban esta a 700. 500 deposit	The suburban is 700. 500 deposit
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Si esta bien el deposito. La quiero pero no tengo el papel del Seguro ahora	Yes, the deposit is fine. I want it but I don't have any paper to secure it now.
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Yo ando con el efectivo aqui. Ya pero me vas a pasar la troca ahora?	I'm over here with the cash. But are you already going to pass me the truck now?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Si	Yes
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Ya me avisas a que hora estas listo	Let me know now what time you'll be ready

(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	Okay me acabada de avisar Que va estar kista a las 8pm. Lista	Okay I warned him to be ready at 8pm
C.L. / Moises B.	9/12/24 @ 6:09 PM	Lmk when the cars are ready	
Moises B./ C.L.	9/12/24 @ 6:20 PM	Fosho. A week for Benz a week for suburban?	
C.L. / Moises B.	9/12/24 @ 6:21 PM	Yea	
Moises B./ C.L.	9/12/24 @ 6:21 PM	500 deposits. 700 suburban. 500 for Benz?	
C.L. / Moises B.	9/12/24 @ 6:21 PM	Ye	
C.L. / Moises B.	9/12/24 @ 6:2 PM	The suburban can gon now if u resdy	
Moises B./ C.L.	9/12/24 @ 6:22 PM	Can they take red jeep tonight bc I got to pick up someone from air port with suburban	
C.L. / Moises B.	9/12/24 @ 6:23 PM	No bro he needs it for the same reason	
Moises B./ C.L.	9/12/24 @ 6:23 PM	Ok	
C.L. / Moises B.	9/12/24 @ 7:13 PM	ETA on the cars	
Moises B./ C.L.	9/12/24 @ 7:29 PM	8 pm	
MOYANO (66newyorkkk) / (Xtrackz)	9/12/24	Como estamos. Listos ono?	How are we? Ready or not?
(Xtrackz) / MOYANO (66newyorkkk)	9/12/24	3150 Wilshire Blvd Ste 100 Los Angeles, CA 90005 United States	
C.L. / Moises B.	9/12/24 @ 9:02 PM	\$xtravibez. Send addy. Asap.	
Moises B./ C.L.	9/12/24 @ 9:02 PM	Win send u \$150 for suburban. Rn	
C.L. / Moises B.	9/12/24 @ 9:03 PM	Okay	
Moises B./ C.L.	9/12/24 @ 9:04 PM	35\$ on top each day for insurance. 7 x 35 Plus 500.	

		Weekly rate. 245 plus 50. 500. 250 deposit.	
Moises B./ C.L.	9/19/24 @ 6:48 AM	Yo. The renters that have the suburban. What's his number? Payment is due today are they renting it another week?	
			
(Xtrackz) / MOYANO (66newyorkkk)	9/19/24 @ 7:14 AM	Yoo. Pa vas a Ocupar otra semana?	Yo. Bro are you going to keep it another week?
MOYANO (66newyorkkk) / (Xtrackz)	9/19/24 @ 12:29 PM	Si hermano nesesito otra semana mas. Te mando a dejar el dinero o te hago un zelle	Yes brother I need it another week more. I can send someone to leave you the money or I can send you a Zelle
MOYANO (66newyorkkk) / (Xtrackz)	9/19/24 @ 3:03 PM	Yo creo que te are el zelle bro. Pero nesesito por unos 4 dias nomas bro. No la semana completa	I think I will do the Zelle bro. But I need it for about 4 days only. Not the entire week.
(Xtrackz) / MOYANO (66newyorkkk)	9/19/24	Dale. Ocupo tu numero. El otro dise disconnect	Go ahead. Send your number. The other says disconnect.
MOYANO (66newyorkkk) / (Xtrackz)	9/19/24	+1 925 705 6572	
MOYANO (66newyorkkk) /	9/19/24	Ok broder. Me dejas el zelle. O si quieres me hablas por	Ok broder. Give me the zelle. Or if you want to call me from WhatsApp

(Xtrackz)		wsp que lo veo mas que el Instagram	because I look at it more than Instagram
(Xtrackz) / MOYANO (66newyorkkk)	9/19/24	818 619 4953 Kim Vega Mandame mensaje 3107353714	818 619 4953 Kim Vega Send me message 3107353714
MOYANO (66newyorkkk) / (Xtrackz)	9/19/24	El primero es del zelle? Y el Segundo es el tuyo?	The first is for the zelle? And the second is yours?
(Xtrackz) / MOYANO (66newyorkkk)	9/19/24	Si	Yes
C.L. / MOYANO	9/19/24 @ 7:46 PM	[OUTGOING CALL TO MOYANO at 925-705-6572] 7 seconds	
MOYANO / C.L.	9/19/24 @7:48 PM	[INCOMING CALL FROM MOYANO USING PHONE NUMBER 925-705-6572] 1 minute	
Moises B./ C.L.	9/19/24 @ 8:00 PM	Wassup with the money for the suburban? Why is he not sending me the bread?	
C.L. / Moises B.	9/19/24 @ 8:00 PM	Just called him	
Moises B./ C.L.	9/19/24 @ 8:00 PM	Why he sending it to ur girl? What's his number? We going to have to pull up	
C.L. / Moises B.	9/19/24 @ 8:01 PM	On him? We will if they don't send it. He said they doing it now. Don't worry I'll handle it. I'm on it.	
Moises B./ C.L.	9/20/24 @ 10:56 AM	What's up with the 7 bills? From the suburban?	
C.L. / Moises B.	9/20/24 @ 10:57 AM	He dropping that off today and probably taking the white jeep. But we talking about the pull out.	

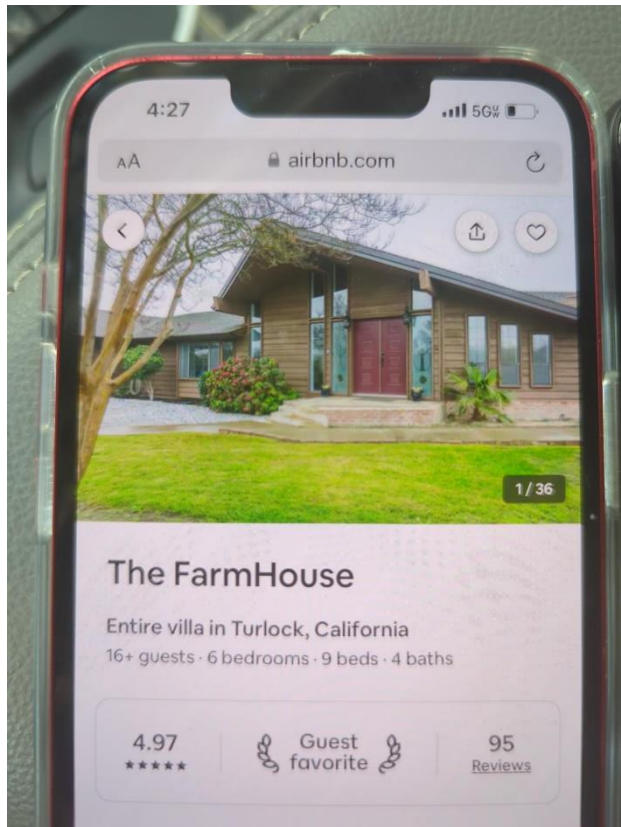
Moises B./ C.L.	9/20/24 @ 11:05 AM	Where my suburban and my 700	
C.L. / Moises B.	9/20/24 @ 11:05 AM	I just told u bro his brother gonna drop off the 700 and probably also take the white jeep	
C.L. / Moises B.	9/20/24 @ 3:13 PM	Was up wit the suburban papers? What's the trucks year	
Moises B./ C.L.	9/20/24 @ 3:13 PM	Why? 2022	
C.L. / Moises B.	9/20/24 @ 3:34 PM	They extended the rental till Sunday	
Moises B./ C.L.	9/22/24 @ 2:54 PM	Where my suburban	

42. Based on my training, experience, and knowledge of this investigation, I know from the above conversation that **MOYANO** reached out to C.L. regarding wanting to rent a Chevrolet Suburban that C.L. was renting through an Instagram post. I know that **MOYANO** originally rented the Suburban from C.L. for a period of a week, beginning on September 12, 2024. When **MOYANO** hadn't returned the Suburban as of September 19, 2024, Moises B. sent C.L. a screenshot of where the Apple Air Tag was showing the Suburban was parked at that time (confidential address referred to herein as Turlock Airbnb) and asked if **MOYANO** would be returning the Suburban or extending the rental for another week. C.L. contacted **MOYANO** and **MOYANO** indicated he wanted to rent the Suburban for an additional four days.

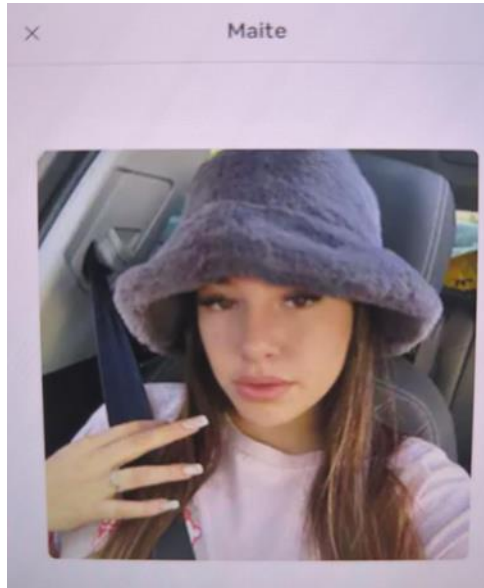
D. Identification of CELIS and renting of Turlock and Mount Shasta Airbnbs as staging locations for robberies.

43. Upon researching the above Turlock Airbnb address where the Apple Air Tag showed the silver Suburban was sitting on September 19, 2024, the investigative team was able to identify that address as an Airbnb rental. Members of the investigative team later contacted the property owner, NK.

44. NK provided the investigative team with access to the historical records from their external surveillance camera system located at their Airbnb rental and confirmed recent guests stayed there from September 17-21, 2024. Members of the investigative team reviewed the historical camera footage and identified **MOYANO** at the location, in addition to numerous individuals who were believed to be connected to the SATG and the ATM larcenies throughout California. In addition, the surveillance footage showed several vehicles previously identified to have been used in the larcenies, including the stolen silver Suburban that was traffic stopped on September 26, 2024. Additionally, **MOYANO** had posted a recent selfie-style photo on his Instagram where he was standing in front of the red door of the Airbnb. Below is a photo from the Airbnb listing, as well as the photo **MOYANO** posted to his Instagram:



45. NK was able to identify the profile photo and name of the individual who had booked the Airbnb from him/her. The name was listed as “Maite,” with the below profile photo:



46. The investigative team was able to locate this account on Airbnb and identified the account holder as Maite Belen **CELIS** Silva. **CELIS** had left a review on the property owner’s Airbnb profile. The investigative team then reviewed additional Airbnb reviews made by **CELIS** and located a more recent Airbnb that **CELIS** had reviewed at a residence located in Mount Shasta, CA (Address known but omitted for confidentiality and referred to here as Mount Shasta Airbnb). On September 27, 2024, a member of the investigative team contacted the property manager for the Mount Shasta Airbnb, LT, who confirmed a large group of individuals had rented the Airbnb from September 23-25, 2024. LT confirmed that **CELIS’** phone number was (305) 850-1042. LT also provided video surveillance from outside the Mount Shasta Airbnb.

47. On September 28, 2024, a member of the investigative team made a recorded ruse phone call to (305) 850-1042 and a female answered the phone and confirmed she was **CELIS**. The agent identified himself as the owner of an Airbnb in Mount Shasta and informed **CELIS** that his wife had found a black wallet, and they were wondering if a member from their party had mistakenly left it behind. **CELIS** could be heard speaking in Spanish with several individuals in the background. **CELIS** confirmed that she was currently staying around Mount Shasta at a different Airbnb, but that she was unaware of anyone from her group losing a wallet. Based on this conversation and **CELIS’** phone

number being connected to her Airbnb account, I believe she was the user of (305) 850-1042 and was booking Airbnbs for the Chilean SATG. Additionally, a member of the investigative team reviewed the camera footage from the Turlock and Mount Shasta Airbnbs and confirmed a female, visually similar to **CELIS**, was present at both the Airbnbs, along with numerous other individuals.

48. Below are photographs from the Mount Shasta Airbnb, including loading and unloading several boxes of large equipment, believed to be bank burglary tools and blowtorches:

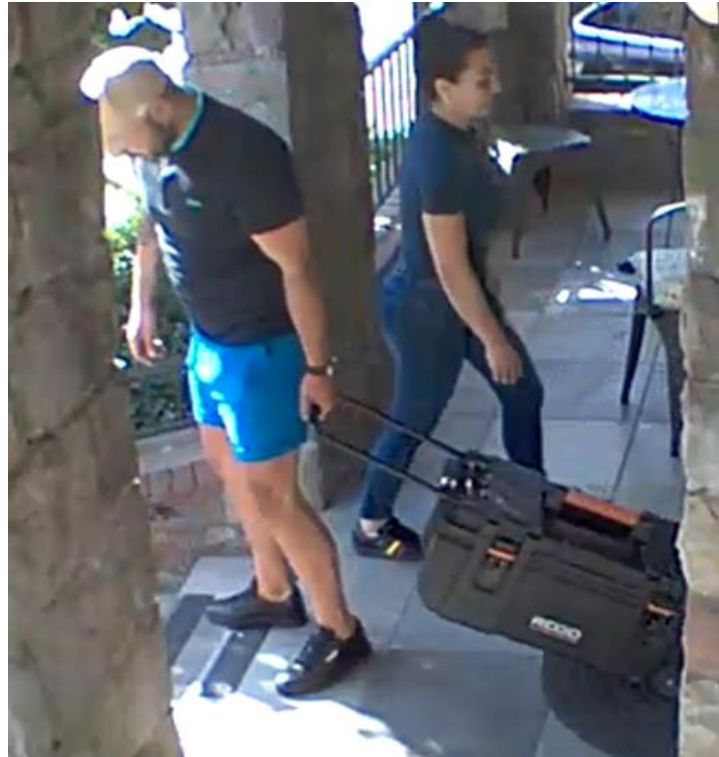


49. Pictured above is believed to be MAITE, who appears to be pregnant and was also seen on surveillance footage at the Airbnb in Turlock.



50. Pictured above is **SEPULVEDA**, who I believe has conducted numerous ATM larcenies over the last several months. Pictured here he is wearing a tan baseball cap with an upside down LA symbol. This hat was seen on a similar male scouting numerous Fresno locations.





51. Pictured above are several case subjects, including a female, **BASTIAS**, packing large construction-style roller cases and Husky-style work bags into the Airbnb. In the days following the above law enforcement recovered similar looking cases and bags from a bank larceny location in Fall River Mills, CA.

52. Pictured below are two items of evidence seized from the bank robbery in Fall River Mills that occurred on 9/28/2024, which is an hour drive from the Mt. Shasta Airbnb.



E. Car location data leads the investigative team to an Oregon Airbnb, where investigators found mass of robbery tools and construction disguises.

53. Investigators reviewed the surveillance footage from the Turlock and Mount Shasta Airbnbs and identified several cars that were present at either or both locations. One of those cars was a white Audi SUV, bearing CA license plate (9MBD530). On October 11, 2024, investigators obtained a warrant for tracking the location of the white Audi.

54. On October 16, 2024, GPS location pings became available to the FBI and showed the location of the white Audi in an area near Welches, Oregon with a 300-meter GPS ping radius. Later that day, investigators positively identified the above-mentioned silver-colored Audi bearing license plate (6XMP034)—which had been connected to the September robberies as described above—traveling

1 down a country road in a wooded area. The white Audi was later spotted at an Airbnb in Oregon, along
2 with a silver Ford Fiesta (bearing California license plate 9CCP947) and a brown Honda CRV (bearing
3 California license plate 9MRR611). All three vehicles were previously seen together at the Turlock
4 Airbnb. Investigators also observed multiple Hispanic-looking males and a Hispanic-looking female
5 coming and going from the deck of the Airbnb. After conducting online open-source checks of the
6 Airbnb website, it was discovered this address was an Airbnb rental. An investigator contacted the
7 Airbnb property manager and was told it was booked until October 22, 2024.

8 55. Agents contacted FBI officials in Portland, who told them that during the first part of
9 October – the time between when I believe the SATG group headed north into Oregon from Mount
10 Shasta and the time they were located in Portland, Oregon – there were at least two additional
11 bank/ATM larcenies committed in Oregon. Both of those larcenies matched the modus operandi of
12 numerous prior larcenies committed by this SATG as described throughout this affidavit.

13 56. While conducting surveillance on October 18, 2024, around the hours of 10:00 AM,
14 agents observed several Hispanic looking males exit the residence and smoke on the rear porch deck.
15 One male was taller than the rest and was wearing a black MLB hat with a yellow “P” on it, for the
16 Pittsburgh Pirates. He was subsequently identified as **ALARCON**.

17 57. During surveillance around the hours of 11:00 AM, the Honda CRV was observed
18 leaving the residence with a lone Hispanic looking male driving. The male was surveilled by FBI
19 surveillance to the Portland airport where he picked up a lone female. The male stopped at Starbucks
20 prior to picking up the female at the airport. This male has now been identified as **DACOSTA**.

21 58. At 12:57 PM, several Hispanic males walked from the back porch of the house to the
22 front of the house (other surveillance agents had view of the front of the house) where they opened and
23 closed the doors to the silver Ford Fiesta. Agents believed the suspects were loading items into the car.
24 Some of the Hispanic males were wearing backpacks. Minutes later, several suspects left in the silver
25 Ford Fiesta. Surveillance agents followed, and the silver Ford Fiesta conducted counter surveillance
26 including pulling into side roads, turning around, and changing directions, etc.

27 59. Shortly thereafter, the white Audi was observed leaving the residence. Mobile
28 surveillance caught up to the white Audi and surveilled it. The white Audi drove well below the speed

1 limit and engaged in other counter surveillance techniques including changing directions and driving
2 through apartment complex lots without stopping. Investigators identified the occupants of the white
3 Audi as **BASTIAS** and **SEPULVEDA**, the two individuals I have previously observed on surveillance
4 as participants in the September 18, 2024, robbery of the Wells Fargo ATM in Modesto as described
5 above (and below).

6 60. The location data for the white Audi then showed that it remained in the Portland area for
7 several hours. The next location data that investigators received for the white Audi indicated that the car
8 was in the Seattle, WA area, near the location of another Airbnb later identified by agents as discussed
9 below.

10 61. On the same date, October 18, 2024, investigators obtained a residential search warrant at
11 the Oregon Airbnb. Investigators executed the warrant on October 19, 2024, around 6:00 AM. The
12 residence was unoccupied, and no vehicles were present. All interior lights had been left on.
13 Investigators found food sitting out, clothing in the house, and an empty suitcase. Investigators also
14 located portable shades for covering windows. (In the Sept. 27 Fall River Mills ATM robbery, the
15 robbers used temporary shades duct taped to the windows to block out the windows). On the side porch
16 of the residence, investigators found four or five large Husky-brand hard-shell rolling toolboxes with
17 retractable handles (consistent with those toolboxes seen at prior Airbnbs on surveillance footage and
18 found at prior bank/ATM robberies). Importantly too, a couple of the Husky toolboxes had missing
19 latches (consistent with the toolboxes observed in surveillance footage from the Mount Shasta Airbnb).
20 Upon opening the toolboxes, investigators found hundreds of pounds of power tools, including portable
21 saws, blowtorch equipment, acetylene or oxygen tanks, yellow prybars, cutting tools, sledgehammers,
22 heavy duty rope, goggles, respirators, construction vests and helmets, sweatpants, Nike shoes, boxes of
23 covid masks, GoPro cameras, two cellphone jammers, etc. These items are consistent with items seen in
24 surveillance footage of the various ATM/bank robberies and recovered from prior robbery locations.

25 62. Investigators spoke with a neighbor of the Oregon Airbnb. The neighbor explained that
26 on October 16 a white Audi entered his driveway (according to him, a common occurrence for renters of
27 the neighboring property). It was a Hispanic female driver with a Hispanic male passenger. They
28 indicated that they did not speak English but showed him a photograph of the rental unit, and he pointed

1 them to the neighboring property (Oregon Airbnb). Investigators have reviewed a screen shot of the
2 surveillance video that the neighbor provided of this meeting in his driveway and have confirmed that
3 the female driver of the white Audi was **BASTIAS**, based on familiarity of **BASTIAS** from viewing
4 prior surveillance footage at the location of the Modesto robbery before the robbery occurred (Wells
5 Fargo ATM and adjacent pet spa), the Turlock Airbnb, and the Mount Shasta Airbnb.

6 63. On the same day, after the search, the investigative team contacted an employee of
7 Vacasa—the rental management company for the Oregon Airbnb. The employee provided rental history
8 for the Oregon Airbnb and provided the name of the renter as well as the phone number. The employee
9 also indicated that they believed an additional property was rented in Welches and one in Seattle tied to
10 the rental of the Oregon Airbnb. The second rental property in Welches was within 1-2 miles of the
11 Oregon Airbnb. The property in Seattle was an Airbnb located within a half mile from where the white
12 Audi was pinging as discussed above.

13 **F. Investigators encounter suspects at the Seattle Airbnb and find cash as well as**
14 **additional clothing used in the robberies.**

15 64. After identifying the location of the Seattle Airbnb, around 11:00 a.m., investigators
16 compared that address to the location data for the White Audi and found that the White Audi was near to
17 that location. Agents then spotted the White Audi in an alleyway parking spot that was assigned to the
18 Seattle Airbnb.

19 65. While the government prepared a search warrant for the Seattle Airbnb, **BASTIAS** and
20 **SEPULVEDA** exited the property, entered the white Audi, and were stopped and arrested. Shortly
21 thereafter, **VALDEZ**, **DACOSTA**, **ALARCON**, and a fourth Hispanic male attempted to drive away
22 from the Seattle Airbnb in the silver Ford Fiesta, but investigators detained them. Agents questioned the
23 four occupants of the Fiesta and asked if there was anyone inside the Seattle Airbnb, and the occupants
24 denied there being anyone inside.

25 66. Investigators then froze the Seattle Airbnb and ordered out all occupants. Contrary to the
26 statements of **VALDEZ**, **DACOSTA**, **ALARCON**, and the fourth Hispanic male, two females –
27 **PARADA** and a second Hispanic female – were inside the Airbnb.

28 67. **PARADA** and the other female attempted to run out the back of the Airbnb when they

1 were ordered out of the residence. When agents blocked that entrance, **PARADA** continued to move
2 around inside, moving items.

3 68. When **PARADA** finally exited the residence, she was placing a call on her cellular
4 telephone. When agents attempted to take her phone, she fought with three agents/officers to prevent
5 them from getting the phone.

6 69. That same evening, the investigative team obtained a search warrant for the Seattle
7 Airbnb. Inside they found large sums of cash as well as backpacks and clothing that matched that worn
8 during prior robberies. Multiple IDs were located for all the residents.

9 70. An estimated \$20,000 cash was located in a room being used by **DACOSTA**. Three hats
10 with 'upside down LA' symbols were in a room belonging to **SEPULVEDA** and **BASTIAS**. Finally, in
11 **PARADA**'s room, agents located a shipping receipt indicating that she had shipped a FedEx box from
12 Oregon to California on October 16, 2024, the same day that the crew checked into the Oregon Airbnb.
13 The receipt indicated that the shipping cost was over \$100.

14 71. **VALDEZ, DACOSTA, ALARCON, and PARADA** were all arrested.

15 72. Subsequent to the search, agents learned that the fourth Hispanic male in the Ford Fiesta
16 was also present in the Mount Shasta Airbnb through review of surveillance video.

17 **G. Probable cause for the arrest of MOYANO**

18 73. As described above, **MOYANO** was originally identified after the investigative team
19 found that telephone number 516-614-2389 was present in the immediate area and immediate location of
20 at least seven of the bank/ATM larcenies believed to be committed by this SATG. Although the phone
21 number was found to be subscribed to Dunkan Cerda,³ further financial investigation revealed that the
22 phone number was associated with Alex **MOYANO** in multiple money wires and/or money transfers.
23 Upon receiving the returns from a court-ordered tower dump,⁴ the investigative team found that
24 **MOYANO**'s 516-614-2389 number was in the immediate vicinity of, and around the same time as, the
25

26 ³ It is common for people involved in criminal activities to subscribe/associate their cell phone to
27 fake names or monikers in an effort to avoid detection by law enforcement.

28 ⁴ A "tower dump" is a collection of phone numbers and location data from all devices that
connected to a cell tower during a specific time period in an effort to determine the users whose phones
were present in a given area at a given time.

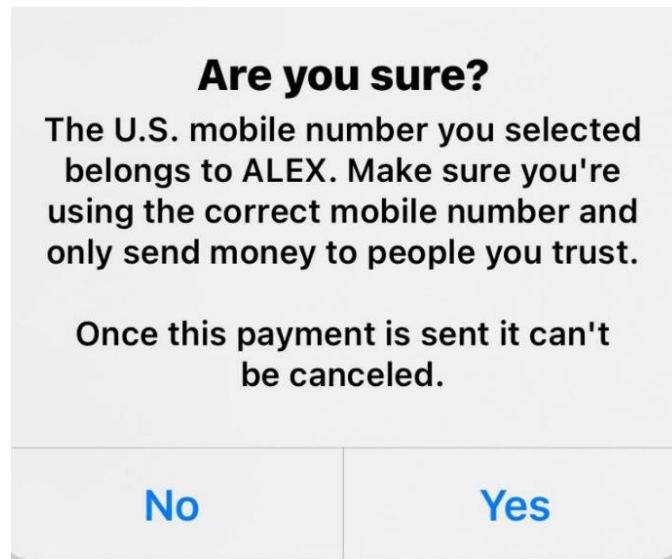
below larcenies:

- a) May 5, 2024: Wells Fargo Bank located at 4472 W. Shaw Avenue #101, Fresno CA – Loss of \$81,860
- b) May 15, 2024: Comerica Bank located at 2432 E. Katella Avenue, Anaheim, CA – Attempt only
- c) May 22, 2024: Golden 1 Credit Union located at 7350 Greenback Lane, Citrus Heights, CA – Loss of \$152,420
- d) May 27, 2024: Golden 1 Credit Union located at 3291 Truxel Road, Sacramento, CA – Loss of \$287,387
- e) June 1, 2024: Golden 1 Credit Union located at 2248 Grass Valley Highway, Auburn, CA – Loss of \$226,000
- f) June 10, 2024: Golden 1 Credit Union located at 5050 Laguna Boulevard, Elk Grove, CA – Attempt only
- g) June 11, 2024: Golden 1 Credit Union located at 1124 W. Olive, Merced, CA – Attempt only

74. On September 30, 2024, the investigative team contacted C.L. again and learned that **MOYANO** had recently contacted C.L. and asked for the return of his \$500 deposit from the rental of the 2022 silver Suburban. **MOYANO** requested the \$500 to be sent to him via a Zelle⁵ account associated with phone number 516-698-6404. When a member of the investigative team used a Zelle

⁵ I know Zelle to be a banking system that allows transfers of money between bank accounts, identified by the phone number associated with a bank account. Because Zelle associates a phone number with a bank account, criminals who use Zelle are more likely to use a permanent phone number to associate to a bank account than a transitory or “dirty” phone number used for a short period of time for criminal activity.

account to attempt to make a transaction with 516-698-6404, they received the following message:



75. Based on the above, I believed **MOYANO** was the likely user of 516-698-6404 and/or used that phone to conduct illegal activities regarding his crew's bank larcenies. I believe the Zelle account connected to 516-698-6404 belonged to Alex **MOYANO**.

76. On October 5, 2024, the Honorable Erica P. Grosjean, U.S. Magistrate Judge in the Eastern District of California, authorized a warrant for a pen register / trap and trace, GPS ping data, and historical cell site information for telephone number 516-698-6404, believed to be used by **MOYANO**. Upon review of the historical cell site records for that phone number, it was found to be in the immediate vicinity and time of at least 15 additional bank/ATM larcenies believed to be associated with this same SATG between June 14, 2024, and September 22, 2024:

DATE/APPX. TIME OF LARCENY:	LOCATION OF LARCENY:	TIME MOYANO'S PHONE WAS IN THE SAME VICINITY:	APPX. AMOUNT OF LOSS:
6/14/24 @ 0041 hours	Ventura County Credit Union Oxnard, CA	2045 hours	\$280,000
6/21/24 @ 1949 hours	Educational Employees CU Clovis, CA	1920 hours – 2211 hours	\$312,000

7/4/24 @ 2148 hours	Loomis Armored Facility Stockton, CA	0213 hours – 2323 hours	Attempt
7/10/24 @ 2311 hours	Educational Employees CU Fresno, CA	2121 hours – 2321 hours	Attempt
7/13/24 @ 0155 hours	Wescom Credit Union Lakewood, CA	0008 hours – 0300 hours	\$55,515
7/20/24 @ 2301 hours	Wescom Credit Union Torrance, CA	1905 hours – 2354 hours	Attempt
7/21/24 @ 2200 hours	Wescom Credit Union Long Beach, CA	2145 hours – 2308 hours	\$36,981
7/24/24 @ 2320 hours	Wells Fargo Mission Viejo, CA	2103 hours – 2358 hours	\$263,831
7/29/24 @ 2318 hours	San Diego County Credit Union Temecula, CA	2047 hours – 2351 hours	\$238,510
7/31/24 @ 2300 hours	San Diego County Credit Union Temecula, CA	2118 hours – 2313 hours	\$138,710
9/15/24 @ 1934 hours	Valley Credit Union Fresno, CA	1118 hours – 2304 hours	Attempt
9/15/24 @ 2230 hours	Educational Employees CU Fresno, CA	2131 hours – 2254 hours	\$200,000
9/18/24 @ 2130 hours	Wells Fargo Modesto, CA	1211 hours & 2005 hours – 2108 hours	\$250,000
9/22/24 @ 1907 hours	Golden 1 Credit Union Rocklin, CA	1629 hours – 2006 hours	\$58,740
9/22/24 @ 2131 hours	Golden 1 Credit Union Yuba City, CA	2117 hours – 2214 hours	Attempt

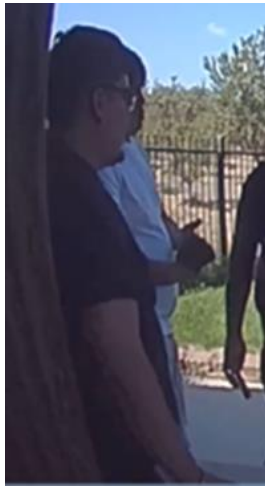
77. As described above, members of the investigative team thoroughly reviewed the footage from the surveillance cameras located at both the Turlock and Mount Shasta Airbnbs. Upon doing so, it was discovered that both **MOYANO** and the silver Chevy Suburban he rented from C.L. were present at the Turlock Airbnb between September 17 and September 21, 2024, as seen in the below still images:



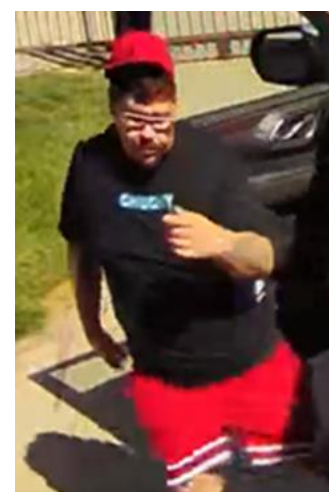
9/17/24



9/18/24



9/19/24



9/21/24



9/21/24



9/17/24



9/18/24



9/19/24

78. Specifically, the silver Chevy Suburban departed from the Turlock Airbnb on September 18, 2024, at approximately 1034 hours. Although the surveillance camera did not capture everyone who got into the Suburban before it departed, **MOYANO** was believed to be one of the occupants. At 1501 hours, the Suburban arrived back at the Airbnb with **MOYANO**, **OSORIO**, and another unidentified male as occupants. **OSORIO** was wearing the same clothing, baseball hat, and shoes that he was wearing when captured by surveillance cameras at approximately 1245 hours scouting out the Diamond in the Ruff pet spa adjacent to the Wells Fargo ATM machines. This corresponds with **MOYANO's** cell phone being present in the area of the Wells Fargo ATMs at 1211 hours. Based on all this, I believe **MOYANO** drove to the area of the Ruff pet spa adjacent to the Wells Fargo ATM machines along with other members of the crew so that they could conduct surveillance in advance of the Wells Fargo robbery in Modesto, CA that occurred later that day.

79. On October 1, 2024, the Honorable Erica P. Grosjean, U.S. Magistrate Judge in the Eastern District of California, authorized a search warrant for the content of the Facebook page of **CELIS** and the Instagram pages of both **CELIS** and **MOYANO**. Upon reviewing both of **CELIS's** social media accounts, it was confirmed that **OSORIO** was indeed the boyfriend and soon to be father of her child. There were numerous photos and videos of them together, to include from both gender reveal and baby shower parties. Below is a May 31, 2024, post where **MOYANO** videotaped a child shuffling through a large stack of hundred-dollar bills, followed by an August 28, 2024, post of **MOYANO** holding a large amount of cash:



80. Based on the fact that **MOYANO** rented a stolen Chevy Suburban that was identified as being present at multiple bank/ATM larceny locations, two separate phones associated with **MOYANO** were found to be in the immediate vicinity of the location of 22 separate larcenies or attempted larcenies of banks/ATMs, and **MOYANO** was captured on the Turlock Airbnb surveillance camera associating and coming and going with multiple other subjects who have been captured on surveillance cameras participating in both scouting and committing multiple bank/ATM larcenies, I believe there is probable cause to issue an arrest warrant for **MOYANO** for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), 2 (aiding and abetting).

H. Probable cause for the arrest of CELIS

81. As described above, **CELIS** was determined to be involved in renting Airbnbs utilized by this SATG. Upon subpoenaing **CELIS**' historical Airbnb rental records, it was determined that **CELIS** rented multiple Airbnbs at times and locations that coincide with several of the ATM burglaries or attempted burglaries, as outlined below:

RESERVATION DATE:	LOCATION OF AIRBNB:	DATES OF STAY:	LOCATION OF BANK / ATM BURGLARY:	DATE OF BURGLARY:
6/12/24	Address 1, Bakersfield, CA	6/11/24 – 6/13/24	5050 Laguna Blvd, Elk Grove, CA.	6/10/24
			1124 W. Olive, Merced, CA	6/11/24
6/20/24	Address 2, Bakersfield, CA	6/19/24 – 6/26/24	3180 Fowler Ave, Clovis, CA	6/21/24
9/13/24	Tulare, CA	9/13/24 – 9/17/24	3085 E. Campus Point Dr, Fresno, CA	9/15/24
			7685 N. Fresno St, Fresno, CA	9/15/24
9/17/24	Turlock, CA	9/17/24 – 9/21/24	2401 E. Orangeburg Ave, Modesto, CA	9/18/24

9/21/24	Yuba City, CA	9/21/24 – 9/25/24	6839 Fivestar Blvd #D, Rocklin, CA	9/22/24
			1282 Stabler Ln #640, Yuba City, CA	9/22/24
9/23/24	Address 1, Mount Shasta, CA	9/23/24 – 9/25/24	43308 Hwy 299 E, Fall River Mills, CA	9/28/24
9/25/24	Address 2, Mount Shasta, CA	9/25/24 – 9/27/24		

82. In addition, as outlined above, review of the surveillance videos from both the Turlock and Mount Shasta Airbnbs, revealed that **CELIS** was present at both, along with her boyfriend **OSORIO, MOYANO**, and several other subjects who have been identified as participating in numerous of the bank/ATM larcenies. **CELIS** was also present at these Airbnbs while others were moving numerous large tool bags and toolboxes, used during the commission of these bank/ATM larcenies, in and out of the Airbnbs. Based on all the above, I believe there is probable cause to issue an arrest warrant for **CELIS** for violations of Title 18, United States Code U.S. Code §§ 371 and 2113(a), 2 (aiding and abetting).

I. Probable cause for the arrest of OSORIO



83. Upon identifying **CELIS** as the renter of the Airbnbs, the investigative team located a Facebook account (User ID: 100008224993282) and an Instagram account (User ID: 3662443724) associated with **CELIS**. While reviewing **CELIS**' public Facebook page, I located a September 13, 2024, post from a baby shower that **CELIS**' was having. Within the post were multiple photos with **CELIS** and the presumed father (**OSORIO**) of her expected child. Upon comparison of those photos to the surveillance video obtained from the Turlock and Mount Shasta Airbnbs, I verified that **OSORIO** was also present at both Airbnbs. The identity of **OSORIO** was obtained by submitting the below left side photo from the September 13, 2024, Facebook post to a facial recognition program. That program returned a potential match of the photo to Department of State (DOS) Visa photos of **OSORIO** (below




right).









84. Upon comparing the potential matches, it was determined to indeed be **OSORIO**. A review of **OSORIO**'s criminal history revealed a 2022 arrest for Grand Theft and False Identification, a 2022 arrest for Burglary of an Unoccupied Structure, and a 2023 arrest for Use/Possess the ID of Another Person Without Consent.

85. In addition to being captured by both the Turlock and Mount Shasta Airbnb surveillance cameras, **OSORIO** was captured by surveillance camera's scouting out and participating in the September 18, 2024, Wells Fargo ATM larceny in Modesto, as well as at the September 22, 2024, Golden 1 Credit Union ATM larceny in Rocklin, CA. It should be noted that **OSORIO** was wearing the exact same clothing when coming and going from the Turlock Airbnb on September 18, 2024, as he was seen wearing while scouting out and standing lookout at the Wells Fargo ATM larceny that same day. Below is a timeline of events involving **OSORIO**, along with images of **OSORIO** during those times:

DATE / TIME:	DESCRIPTION:	IMAGE:
9/17/24 @ 1822 hours	OSORIO arriving at the Airbnb located at 12810 Pepper St, Turlock, CA	
9/18/24 @ 1034 hours	OSORIO departing the Airbnb located at 12810 Pepper St, Turlock, CA on the day of the Modesto Wells Fargo ATM larceny.	

1 2 3 4 5 6 7 8 9 10 11 12 13	9/18/24 @ 1222 hours	OSORIO arrived at the Diamond in the Ruff pet spa located at 2401 E. Orangeburg Ave, Modesto, CA in order to case access to the adjacent Wells Fargo ATM machines. OSORIO and a female distracted the employee while a third person (VALDEZ) looked for interior surveillance cameras and knocked on the wall adjacent to the ATM location to test the material.	
14 15 16 17 18	9/18/24 @ 1248 hours	OSORIO returned to the Diamond in the Ruff pet spa located at 2401 E. Orangeburg Ave, Modesto, CA to distract the pet spa employee again while other members of the group spray painted exterior surveillance cameras.	
19 20 21 22 23 24 25 26	9/18/24 @ 1501 hours	OSORIO arrived back at the Airbnb, located at 12810 Pepper St, Turlock, CA, along with MOYANO and another unidentified subject. OSORIO was still wearing the same clothes and was a passenger in the stolen grey Suburban.	
27 28	9/18/24 Between 1841 and 1849 hours	The white Ford Explorer departed undetected from the Turlock Airbnb	[NO VIDEO WAS CAPTURED]

1	9/18/24 @ 2045 hours	Surveillance video stills of who is believed to be OSORIO low crawling inside the Diamond in the Ruff pet spa after hours wearing what appears to be the same blue shirt, dark pants, white hat, and white and blue shoes.	
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13	9/18/24 @ 2121 hours	OSORIO by the white Ford Explorer (which was utilized during the commission of multiple bank/ATM larcenies) while on lookout outside of the Modesto Wells Fargo ATMs.	
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20	9/18/24 @ 2209 hours	OSORIO returned to the Turlock Airbnb wearing the same clothes.	
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<p>9/18/24 @ 2230 hours</p>	<p>OSORIO exited the Turlock Airbnb and departed as driver of the white Ford Explorer.</p>	
<p>9/19/24 @ 0147 hours</p>	<p>OSORIO loading a grey, black and red Jordan backpack seen during the commission of multiple bank/ATM larcenies into a white Audi.</p>	
<p>9/22/24 @ 1749 hours</p>	<p>Believed to be OSORIO carrying the red and blacky Husky tool bag at the Golden 1 Credit Union ATM larceny.</p>	

		
9/23/24 @ 1928 hours	OSORIO arriving at the Mount Shasta Airbnb.	
9/24/24 @ 1334 hours	OSORIO hauling tool cases similar to those left behind at bank/ATM larcenies into the Mount Shasta Airbnb.	

<p>9/25/24 @ 1029 hours</p>	<p>OSORIO preparing to depart from the Mount Shasta Airbnb.</p>	
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86. Based on the above information, I believe there is probable cause to issue a warrant for **OSORIO's** arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), 2 (aiding and abetting).

J. Probable cause for the arrest of VALDEZ



87. Upon review of the surveillance video obtained from both the Turlock and Mount Shasta Airbnbs, as well as the surveillance video associated with the scouting and larcenies that occurred at the Wells Fargo ATMs in Modesto, CA on September 18, 2024; the Golden 1 Credit Union ATMs in Rocklin, CA on September 22, 2024; and the Tri Counties Bank in Fall River Mills, CA on September 27, 2024, **VALDEZ** was believed to be present at, at least, all those locations. The below-left photo obtained from the Turlock Airbnb surveillance video was sent to a facial recognition program which sent back a possible match to the below-right booking photo of **VALDEZ**.






88. Upon review of the surveillance videos to the booking photo of **VALDEZ**, the investigative team determined it to be the correct person. A review of **VALDEZ**'s criminal record showed that he was arrested by the FBI – LEGAT in Santiago Chile in 2012. **VALDEZ** was also arrested in Glendale, CA in 2024 for Grand Theft. Below is a timeline of events involving **VALDEZ**, along with images of **VALDEZ** during those times:

DATE / TIME:	DESCRIPTION:	IMAGE:
9/18/24 @ 1222 hours	VALDEZ looked for interior surveillance cameras inside the Diamond in the Ruff pet spa adjacent to the Wells Fargo ATM prior to the larceny that same evening.	
9/18/24 @ 1222 hours	VALDEZ knocked on the wall of the Diamond in the Ruff pet spa that was adjacent to the Wells Fargo ATM room, to test how the wall was constructed (i.e. sheetrock vs. concrete block), prior to the larceny that same evening.	

<p>9/18/24 @ 1248 hours</p>	<p>While OSORIO and BASTIAS continued to distract the Diamond in the Ruff pet spa employees, VALDEZ carried a pallet over so that SEPULVEDA could stand on it and spray paint an exterior surveillance camera.</p>	
<p>9/18/24 @ 1250 hours</p>	<p>VALDEZ stood watch while SEPULVEDA spray painted the exterior surveillance camera that captured the rear entrance to the Diamond in the Ruff pet spa area.</p>	

<p>9/18/24 @ 1613 hours</p>	<p>VALDEZ arrived at the Turlock Airbnb wearing the same clothing he was wearing when scouting out the Diamond in the Ruff pet spa and adjacent Wells Fargo ATM's.</p>	
<p>9/22/24 @ 1749 hours</p>	<p>Believed to be VALDEZ, with OSORIO, SEPULVEDA, and JOHN DOE 2 at the Golden 1 Credit Union ATM larceny in Rocklin, CA.</p>	

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1 2 3 4 5 6 7 8 9 10 11 12	9/25/24 @ 0942 hours	VALDEZ at the Mount Shasta Airbnb	
13 14 15 16 17 18 19 20 21 22 23 24 25 26	9/27/24 @ 2140 hours	Believed to be VALDEZ inside the Tri Counties Bank in Fall River Mills [based on build, facial hair, and earlobes]	



89. Based on the above information, I believe there is probable cause to issue a warrant for

VALDEZ's arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2 (aiding and abetting).

K. Probable cause for the arrest of BASTIAS

90. Upon review of the surveillance videos obtained from both the Turlock and Mount Shasta Airbnbs, as well as the surveillance video associated with the scouting and ATM larceny that occurred at the Wells Fargo ATMs in Modesto, CA on September 18, 2024, **BASTIAS** was found to be present at all those locations. Below is a timeline of events involving **BASTIAS**, along with images of **BASTIAS** during those times:

DATE / TIME:	DESCRIPTION:	IMAGE:
9/18/24 @ 1222 hours	BASTIAS, OSORIO, and VALDEZ arrived at the Diamond in the Ruff pet spa located at 2401 E. Orangeburg Ave, Modesto, CA, in order to case access to the adjacent Wells Fargo ATM machines. BASTIAS and OSORIO distracted the employees while VALDEZ looked for interior surveillance cameras and knocked on the wall adjacent to the ATM location to test the material.	

<p>9/18/24 @ 1248 hours</p>	<p>BASTIAS and OSORIO returned to the Diamond in the Ruff pet spa minutes later to distract the pet spa employees again while VALDEZ and SEPULVEDA spray painted an exterior surveillance camera that aimed at the rear entrance to the pet spa.</p>	
<p>9/18/24 @ 1906 hours</p>	<p>BASTIAS seen on surveillance video at the Turlock Airbnb wearing the same clothing as she wore while scouting at the Diamond in the Ruff pet spa.</p>	

1 2 3 4 5 6 7	9/23/24 @ 2159 hours	BASTIAS arriving at the Mount Shasta Airbnb	
8 9 10 11 12 13 14 15 16 17	9/24/24 @ 1238 hours	BASTIAS with visible shoulder tattoo at the Mount Shasta Airbnb	

<p>9/25/24 @ 0958 hours</p>	<p>BASTIAS departing from the Mount Shasta Airbnb moving large Husky and Rigid brands rolling tool cases, similar to ones left behind at the September 27, 2024, Tri Counties Bank larceny.</p>	
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91. **BASTIAS** was also identified driving the white Audi on October 16, 2024, at the property next to the Oregon Airbnb, and driving the same car on October 18, 2024, shortly after leaving the Oregon Airbnb, which contained all the robbery tools found during the October 19, 2024, search

warrant.



92. Based on **BASTIAS's** involvement in scouting out the Diamond in the Ruff pet Spa and adjacent Wells Fargo ATM machines along with **OSORIO, VALDEZ, SEPULVEDA**, and likely other members of this SATG; and her presence and assistance with moving burglary tools at both the Turlock and Mount Shasta Airbnbs, as well as her presence at the Oregon Airbnb and Seattle Airbnb; I believe there is probable cause to issue a warrant for **BASTIAS's** arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), 2 (aiding and abetting).




L. Probable cause for the arrest of SEPULVEDA



93. Upon review of the surveillance videos obtained from both the Turlock and Mount Shasta Airbnbs, as well as the surveillance videos associated with the scouting and bank/ATM larcenies of numerous bank/ATM larcenies, I believe that **SEPULVEDA** was present and involved in at least seven bank/ATM larcenies throughout California. Below is a timeline of events involving **SEPULVEDA**, along with images of **SEPULVEDA** during those times:

DATE / TIME:	DESCRIPTION:	IMAGE:
9/18/24 @ 1248 hours	SEPULVEDA scouting and spray painting the surveillance camera at the Diamond in the Ruff pet spa adjacent to the Wells Fargo ATMs in Modesto, CA. SEPULVEDA was assisted by VALDEZ, OSORIO , and BASTIAS .	

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8	9/18/24 @ 1656 hours	SEPULVEDA exited the Turlock Airbnb wearing the same outfit as seen while scouting the Wells Fargo ATM in Modesto and spray painting the surveillance camera.	
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<p>9/18/24 @ 2036 hours</p>	<p>SEPULVEDA pulled on the door to Diamond in the Ruffpet spa to see if it was indeed locked around the time of the Modesto Wells Fargo ATM larceny.</p>	
<p>9/18/24 @ 2039 hours</p>	<p>SEPULVEDA acted as a lookout at the Modesto Wells Fargo ATM larceny wearing a grey, black and red Jordan backpack.</p> <p>NOTE: He had white dust on the front and back of his sweatpants, possibly from accessing the pet spa.</p>	

<p>9/24/24 @ 1238 hours</p>	<p>SEPULVEDA carried two backpacks (including the grey, black, and red Jordan backpack worn during the Modesto Wells Fargo ATM larceny) into the Mount Shasta Airbnb.</p>	
<p>9/25/24 @ 0945 hours</p>	<p>SEPULVEDA carried the two backpacks (including the grey, black, and red Jordan backpack worn during the Modesto Wells Fargo ATM larceny) out of the Mount Shasta Airbnb.</p>	 

<p>9/25/24 @ 0958 hours</p>	<p>SEPULVEDA pulled a Rigid toolbox out of the Mount Shasta Airbnb similar to ones left behind at the September 27, 2024, Tri Counties Bank larceny in Fall River Mills.</p>	
<p>9/27/24 @ 2140 hours</p>	<p>SEPULVEDA wearing the same grey, black and red Jordan backpack from the September 18, 2024, Modesto Wells Fargo ATM larceny inside the Tri Counties Bank in Fall River Mills, CA.</p>	






94. **SEPULVEDA** was also identified as an occupant of the white Audi on October 18, 2024, shortly after that car left the Oregon Airbnb, which contained all the robbery tools found during the October 19, 2024, search warrant.




95. Based on **SEPULVEDA**'s clear involvement in scouting and participating in multiple bank/ATM larcenies, along with other members of this SATG, as well as his presence at the Oregon Airbnb and the Seattle Airbnb, I believe there is probable cause to issue a warrant for **SEPULVEDA**'s arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2 (aiding and abetting).



M. Probable cause for the arrest of JOHN DOE 2


96. Upon review of the surveillance videos obtained from both the Turlock and Mount Shasta Airbnbs, as well as the surveillance videos associated with the scouting and bank/ATM larcenies of numerous bank/ATM larcenies, I believe that **JOHN DOE 2** was present and involved in at least seven bank/ATM larcenies throughout California. Below is a timeline of events involving **JOHN DOE 2**, along with images of **JOHN DOE 2** during those times:

DATE / TIME:	DESCRIPTION:	IMAGE:
9/17/24 @ 2003 hours	JOHN DOE 2 arrived at the Turlock Airbnb.	

1 2 3 4 5 6 7 8	9/18/24 @ 1621 hours	JOHN DOE 2 arrived at the Turlock Airbnb. Note the black Under Armor backpack and the black high- top shoes with white toes and a thick white sole.		
9 10 11 12 13 14 15 16	9/18/24 @ 1813 hours	JOHN DOE 2 exited the Turlock Airbnb wearing a blue hooded sweatshirt, blue sweatpants, and the same black and white Under Armor backpack.		
17 18 19 20 21 22 23 24 25 26 27 28	9/18/24 @ 1928 hours	JOHN DOE 2 seen outside the Turlock Airbnb wearing blue sweats, the Under Armor backpack, and the black high- tops with white toes and white sole.		

1 2 3 4 5 6 7 8 9	9/18/24 @ 2039 hours	JOHN DOE 2 wearing the same clothes, shoes, and backpack while at the larceny of the Wells Fargo ATMs in Modesto, adjacent to the Diamond in the Ruff pet spa.	
10 11 12 13 14 15	9/18/24 @ 0958 hours	JOHN DOE 2 was believed to have arrived back at the Turlock Airbnb along with OSORIO . JOHN DOE 2 waited in the driver's seat of the white Ford Explorer while OSORIO went inside.	
16 17 18 19 20 21 22 23 24 25 26 27 28	9/18/24 @ 2230 hours	JOHN DOE 2 exited the driver's seat of the white Ford Explorer and got back in the passenger's side. He appeared to be wearing the same blue sweatpants and the same black high-tops as while at the Modesto Wells Fargo ATM larceny. Moments later, OSORIO got in the driver's side, and they departed.	

1 2 3 4 5 6 7 8 9 10 11	<p>9/22/24 @ 1726 hours</p> <p>JOHN DOE 2, SEPULVEDA, OSORIO, VALDEZ, and other SATG members were dropped off by the stolen silver Chevy Suburban next to the Golden 1 Credit Union ATMS in Rocklin, CA that were burglarized for \$58,740.</p> <p>Note that JOHN DOE 2 was wearing the same black high-tops with thick white soles and white toes, blue sweatpants, and black and white Under Armor backpack as he wore during the Modesto Wells Fargo ATM larceny on 9/18/24.</p>	
12 13 14 15 16 17 18 19 20 21 22	<p>9/22/24</p> <p>JOHN DOE 2, SEPULVEDA, OSORIO, VALDEZ, and other SATG members were dropped off by the stolen silver Chevy Suburban next to the Golden 1 Credit Union ATMS in Rocklin, CA that were burglarized for \$58,740.</p> <p>Note that JOHN DOE 2 was wearing the same black high-tops with thick white soles and white toes, blue sweatpants, and black and white Under Armor backpack as he wore during the Modesto Wells Fargo ATM larceny on 9/18/24.</p>	

<p>9/22/24</p>	<p>JOHN DOE 2, SEPULVEDA, OSORIO, VALDEZ, and other SATG members were dropped off by the stolen silver Chevy Suburban next to the Golden 1 Credit Union ATMS in Rocklin, CA that were burglarized for \$58,740.</p> <p>Note that JOHN DOE 2 was wearing the same black high-tops with thick white soles and white toes, blue sweatpants, and black and white Under Armor backpack as he wore during the Modesto Wells Fargo ATM larceny on 9/18/24.</p>	
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97. Based on **JOHN DOE 2's** clear involvement in scouting and participating in multiple bank/ATM larcenies, along with other members of this SATG, I believe there is probable cause to issue a warrant for **JOHN DOE 2's** arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2 (aiding and abetting).

N. Probable cause for the arrest of DACOSTA

98. **Bassil Alejandro DACOSTA Frias (DACOSTA)**, aka: "**Armando Garcia Montoya**", aka: "**Francisco Antonio Marin Jitebaca**" is a Venezuelan national who has resided in Chile and is believed to be involved in this SATG. He is associated with FBI number RV1049PA7 and a 2022 "alien inadmissibility" encounter with CBP.

99. **DACOSTA** was observed at both the Mount Shasta Airbnb and the Airbnb connected to the SATG crew in Welches, Oregon, where he left the Airbnb and traveled to the airport to pick up a female (this female was the un-arrested female encountered at the Seattle Airbnb the next day). During that journey, he engaged in counter-surveillance measures to avoid law enforcement detection by driving in a fashion designed to elude pursuit. On October 19, 2024, he was interviewed by FBI agents and admitted that he was trying to not be followed by law enforcement, admitted his presence at the Welches Airbnb, and said that he abandoned the vehicle he had been driving to avoid law enforcement detection.

1 100. The Welches Airbnb, as discussed above, contained a large collection of burglary tools,
2 including construction outfits, facemasks, goggles, clothing, and signal jammers of the sort used by this
3 SATG in bank robberies throughout the Eastern District of California, including specifically disguises of
4 the sort used in Eastern District of California bank robberies.

5 101. **DACOSTA** was further encountered as discussed above with the SATG crew in Seattle,
6 Washington, where he was in a vehicle with **VALDEZ**, who as discussed above has been seen at prior
7 bank robberies, as well as **ALARCON**, who as described below is consistent with a person who has
8 been seen at prior bank robberies, as well as a fourth individual who was believed to be observed at the
9 Mount Shasta Airbnb. At the time of that encounter, **DACOSTA** was wearing the same green-colored
10 Guess T-shirt as he was observed wearing on surveillance video from the Mount Shasta Airbnb. When
11 questioned, all the occupants denied that there was anyone inside the Seattle Airbnb, but in fact there
12 were two females in the Seattle Airbnb, including **PARADA**, who as discussed below was also present
13 in Oregon and was sending packages from Oregon to California. I believe that the occupants were
14 attempting to conceal the individuals in the Airbnb from law enforcement, and this is further evidence of
15 their involvement in this ongoing conspiracy.

16 102. During the search of the Seattle Airbnb, a large amount of currency was found in a
17 suitcase identified by an occupant as **DACOSTA**'s. Based on my training and experience, I know that
18 robbery crews are tight-knit and that this crew has been traveling continuously from California to
19 Oregon to Washington. I therefore believe that his presence in Washington and Oregon and his
20 association with members of the crew who were seen in California is an indication that he is a member
21 of this conspiracy.

22 103. Finally, I have reviewed surveillance video of the Tri Counties Bank robbery in Fall
23 River Mills, CA. One of the individuals captured on that video had a very similar facial profile and nose
24 shape as **DACOSTA**. Based on those similarities in appearance, combined with the fact that
25 **DACOSTA** was captured on surveillance cameras at the Mount Shasta Airbnb in the days immediately
26 prior to the Fall River Mills larceny, I believe that the individual observed on surveillance cameras at the
27 Tri Counties Bank was likely **DACOSTA**.

28 104. Based on all these facts, I believe there is probable cause to issue a warrant for

1 **DACOSTA's** arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2
2 (aiding and abetting).

3 **O. Probable cause for the arrest of ALARCON**

4 105. **Camilo ALARCON Alarcon (ALARCON)**, aka: "**Camilo Alarcon**", is a Chilean
5 national who is believed to be involved in this SATG.

6 106. **ALARCON** was observed in an Airbnb connected to the SATG crew in Welches,
7 Oregon. The Welches Airbnb, as discussed above, contained a large collection of burglary tools,
8 including construction outfits, facemasks, goggles, clothing, and signal jammers of the sort used by this
9 SATG in bank robberies throughout the Eastern District of California, including specifically disguises of
10 the sort used in Eastern District of California bank robberies.

11 107. **ALARCON** was further encountered as discussed above with the SATG crew in Seattle,
12 Washington, where he was in a vehicle with **VALDEZ**, who as discussed above has been seen at prior
13 bank robberies, as well as **DACOSTA**, who as described above is consistent with a person who has been
14 seen at prior bank robberies, as well as a fourth individual who was believed to be observed at the
15 Mount Shasta Airbnb. When questioned, all the occupants denied that there was anyone inside the
16 Seattle Airbnb, but in fact there were two females in the Seattle Airbnb, including **PARADA**, who as
17 discussed below was also present in Oregon and was sending packages from Oregon to California. I
18 believe that the occupants were attempting to conceal the individuals in the Airbnb from law
19 enforcement, and this is further evidence of their involvement in this ongoing conspiracy.

20 108. Finally, I have reviewed surveillance video of the Tri Counties Bank robbery in Fall
21 River Mills, CA. Comparing the surveillance video to **ALARCON**, a person consistent with
22 **ALARCON's** appearance was present at that robbery.

23 109. Based on all these facts, I believe there is probable cause to issue a warrant for
24 **ALARCON's** arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2
25 (aiding and abetting).

26 **P. Probable cause for the arrest of PARADA**

27 110. **Michelle Alondra PARADA Munoz (PARADA)**, is believed to be a Chilean national
28 involved in this SATG.

1 111. On October 19, **PARADA** was one of two females present in the Airbnb that **VALDEZ**,
2 **DACOSTA**, **ALARCON** and a fourth Hispanic individual were leaving, all of whom have been linked
3 as described above to bank robberies in California and Oregon. When questioned about the occupants of
4 the Airbnb, those four individuals denied **PARADA**'s presence there. Based on my training and
5 experience, I know that it is common for co-conspirators to attempt to conceal the locations of other
6 conspirators to assist them from evading law enforcement. When an individual is not a member of the
7 conspiracy, there is less need to conceal their identity, as they have no risk if law enforcement is
8 contacted.

9 112. When contact was made with **PARADA** at the Airbnb, she first tried to flee and then
10 delayed coming to the door. She was observed by agents moving around inside of the residence. I know
11 this behavior is consistent with someone who is involved in criminal activity, and because the criminal
12 activity occurring at the Seattle Airbnb was that of the SATG crew, I believe based on my training and
13 experience this is evidence of her membership in the conspiracy.

14 113. When **PARADA** came out, she was dialing an unknown number on her phone, trying to
15 get an answer. I believe that her delay was to try to warn members of the conspiracy that law
16 enforcement was arresting them. When agents moved to seize her phone, she began to fight with agents,
17 requiring three agents to get her phone. This behavior is all consistent in my training and experience
18 with membership in the conspiracy.

19 114. When **PARADA**'s room was searched, agents located a FedEx receipt indicating she had
20 mailed a box from Portland, Oregon to California several days earlier, and importantly, on the same date
21 that the crew checked into the Oregon Airbnb. Based on my training and experience, I think there is a
22 fair probability that this box contained cash or other contraband, as multiple robberies occurred in
23 Oregon and while cash was recovered at the Airbnb it was less than the amount taken in the robberies. I
24 additionally believe that because **PARADA** was sending the box from Oregon to California, it is
25 evidence of her involvement in the ongoing conspiracy across all three states, including those robberies
26 in the Eastern District of California.

27 115. Based on all these facts, I believe there is probable cause to issue a warrant for
28 **PARADA**'s arrest for violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2

(aiding and abetting).

V. REQUEST FOR SEALING

116. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the complaint and affidavit. I believe that sealing this document is necessary because the records relate to an ongoing investigation that includes multiple targets who have not yet been apprehended. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness. Such a disclosure would give the targets an opportunity to notify confederates, change patterns of behavior and/or take steps to destroy evidence.

VI. CONCLUSION

117. Based on the totality of facts set forth in this affidavit, I believe there is probable cause to believe that the defendants **Alex MOYANO Morales, Maite CELIS Silva, Erik OSORIO Olivarez, Pablo VALDEZ Rodriguez, BASTIAS, SEPULVEDA, JOHN DOE 2, DACOSTA, ALARCON** and **PARADA** all committed violations of Title 18, United States Code U.S. Code §§ 371, 2113(a), and 2(aiding and abetting).


118. I respectfully request the issuance of arrest warrants for the individuals listed above.

I declare under penalty of perjury that the facts contained herein are true and correct to the best of my knowledge and belief.



Nathan Blevins, Special Agent
Federal Bureau of Investigation

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2 Attested to by the applicant in accordance with
3 the requirements of Fed.R.Crim.P. 41.1, by internet
4 telephone on **Oct 21, 2024**_____.

5
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7 
8 _____
The Honorable Erica P. Grosjean
United States Magistrate Judge

9 Approved as to form and substance:

10 /s/ Robert L. Veneman-Hughes
11 Robert L. Veneman-Hughes
Assistant United States Attorney
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